

# Privacy Policy

- concerning client's personal data (including Battery Empire.co.uk online shop)

and

- shipment receipt from Battery Empire.co.uk online shop

## Introduction

We (hereafter 'Greencell' '**We**', '**Us**', '**Our**') are Greencell.Global Ltd (Company Number: 13147773) with our registered office at Fidelity House, Fengate, Cambridgeshire, PE1, Peterborough.

Welcome to Our Privacy Policy.

We respect your privacy and are committed to protecting your personal data. This Privacy Policy aims to provide a comprehensive overview and explain how We collect and use any personal information and data We may obtain from you and about you.

## 1. Important information and who We are

### Purpose of this Privacy Policy

This Privacy Policy aims to give you information on how We collect and process your personal data through your use of the Website (<https://batteryempire.co.uk/>), any data you may provide when you purchase a product or service or any data you provide to Us during our business relationship.

It is important that you read this Privacy Policy together with any other policies We may provide on specific occasions when We are collecting or processing any additional personal data about you so that you are fully aware of how and why We are using your data. This Privacy Policy supplements other notices and policies and is not intended to override them.

### Controller

We are the controller and are responsible for your personal data.

If you have any questions about this Privacy Policy, including any requests to exercise your legal rights, please contact us by email [contact@batteryempire.co.uk](mailto:contact@batteryempire.co.uk) or telephone us at +44 808 196 5006.

You have the right to make a complaint at any time to the Information Commissioner's Office ('ICO'), the UK regulator for data protection issues (see [www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact Us in the first instance.

## Changes to the Privacy Policy and your data

We keep our Privacy Policy under regular review.

It is important that the personal data We hold about you is accurate and current. Please keep Us informed if your personal data changes during your relationship with Us.

### 2. The data We collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity markers have been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- - **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- - **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- - **Financial Data** includes bank account and payment card (whether credit or debit) details.
- - **Transaction Data** includes details about payments to and from you and other details of products you have purchased from Us.
- - **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access the Website.
- - **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- - **Usage Data** includes information about how you use the Website and our products.
- - **Marketing and Communications Data** includes your preferences in receiving marketing from Us and our third parties and your communication preferences.

We do not collect, use or share any **Aggregated Data** such as statistical or demographic data for any purpose.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do We collect any information about criminal convictions and offences.

### If you fail to provide personal data

Where We need to collect personal data by law, in order to provide the products under the contract We have with you, or to enforce or perform its terms, and you fail to provide that data when requested, We may not be able to perform the contract We have or are trying to enter into with you (for example, to provide you with goods). In this case, we may have to cancel a product you have with Us but We will notify you if this is the case at the time.

### 3. How We collect the data.

We use different methods to collect data from and about you including through:

- **- Direct interactions.** You may give Us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  1. apply for Our products whether when using the Website or otherwise;
  2. request marketing to be sent to you;
  3. give Us feedback or contact Us.
- **- Automated technologies or interactions.** As you interact with Our website, We will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies
- **- Third parties or publicly available sources.** We will receive personal data about you from publicly available sources, such as Companies House or the electoral register in the UK.

### 4. How We use your personal data

We will only use your personal data when the law allows Us to. Most commonly, we will use your personal data in the following circumstances:

- - Where We need to perform the contract we are about to enter into or have entered into with you.
- - Where it is necessary for Our legitimate interests (or those of a third party) and your interests
- and fundamental rights do not override those interests.
- - Where we need to comply with our legal obligation.

Generally, We do not rely on consent as a legal basis for processing your personal data although We will get your consent before sending third party direct marketing communications to you via email or text message. Where consent applies, you have the right to withdraw consent to marketing at any time by contacting Us.

#### Purposes for which We will use your personal data

We have set out below, in a table format, a description of all the ways We plan to use your personal data, and which of the legal bases We rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that We may process your personal data for more than one lawful ground depending on the specific purpose for which We are using your data. Please contact Us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

| <b>Purpose/Activity</b>  | <b>Type of data</b>   | <b>Lawful basis for processing including basis of legitimate interest</b>   |
|--|---|---|
| To register you as a new customer and enter into a contract with you   | (a) Identity<br>(b) Contact<br>(c) Technical<br>(d) Financial<br>(e) Transaction                                  | Performance of a contract with you  |
| To process and deliver your order to you including:<br>(a) Manage payments, fees and charges<br>(b) Collect and recover money owed to Us   | (a) Identity<br>(b) Contact<br>(c) Financial<br>(d) Transaction<br>(e) Marketing and Communication s              | (a) Performance of a contract with you<br>(b) Necessary for our legitimate interests<br>(to recover debts due to Us)  |
| To manage Our relationship with you which will include:<br>(a) Notifying you about changes to Our terms or privacy policy<br>(b) Asking you to leave a review, provide feedback or take a survey | (a) Identity<br>(b) Contact<br>(c) Profile<br>(d) Marketing and Communication s                                   | (a) Performance of a contract with you<br>(b) Necessary to comply with Our legal obligations<br>(c) Necessary for Our legitimate interests<br>(to keep Our records updated and to study how customers use Our products/services)  |
| To administer and protect Our business and the Website   | (a) Identity<br>(b) Contact<br>(c) Technical  | (a) Necessary for Our legitimate interests<br>(for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)<br>(b) Necessary to comply with our legal obligations |
| To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising We serve to you   | (a) Identity<br>(b) Contact<br>(c) Profile<br>(d) Usage<br><br>(e) Marketing and Communication s<br>(f) Technical | Necessary for Our legitimate interests (to study how customers use Our products, to develop them and to inform our marketing strategy)  |
| To make suggestions and recommendations to you about goods that may be of interest   | (a) Identity<br>(b) Contact<br>(c) Technical  | Necessary for Our legitimate interests (to develop Our products and develop Our   |

|        |  |                                 |
|--------|--|---------------------------------|
| to you | (d) Usage<br>(e) Profile<br>(f) Marketing and Communications | business relationship with you) |
|--------|--|---------------------------------|

## Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

### Promotional offers from us

We may use your identity, contact, technical, usage and profile data to form a view on what We think you may want or need, or what may be of interest to you. This is how We decide which products, services and offers may be relevant for you (we call this marketing). The marketing communications from us will be in respect of the products similar to one you have purchased from us already.

### Third-party marketing

We will get your express opt-in consent before We share your personal data with any third party for marketing purposes.

### Opting out

You can ask Us or third parties to stop sending you marketing messages at any time by contacting US using the contact details in this Privacy Policy. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to Us as a result of a product purchase, warranty registration, product experience or other transactions.

### Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of the Website may become inaccessible or not function properly.

### Change of purpose

We will only use your personal data for the purposes for which We collected it, unless We reasonably consider that We need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact Us.

If We need to use your personal data for an unrelated purpose, We will notify you and We will explain the legal basis which allows Us to do so.

Please note that 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.

## 5. Disclosure of your personal data

We may share your personal data with the parties set out below for the purposes set out in the table in section 4 of this Privacy Policy:

Legal advisors that provide services to us;

- - Payment services companies;
- - Accounting companies;
- - Hosting companies, in particular who operate the Website on Our behalf;
- - Insurance companies;
- - Companies responsible for Our software;
- - Couriers and haulage companies.

We may share your personal data whenever We are legally obliged to do so. Nevertheless, We assure you that every request to disclose your personal data is analysed very carefully and thoroughly, to avoid passing any information inadvertently to unauthorised persons.

We may change the suppliers We use. If you wish to obtain a full list of our suppliers or require any further information with this regard, please contact Us using the contact details in this Privacy Policy.

## **International transfers**

We do not routinely transfer your personal data outside of the UK, with the exception that we will transfer your personal data to:

- - CSG S.A. of 33 Kalwaryjska street, Kraków, Poland ('CSG') – this is because CSG operate the Website on Our behalf and it is critical for Us to be able to share your personal data with them for reasons as set out in this Privacy Policy, in particular in order to enter and perform the contract with you.
- - ECOVIS Wingrave Yeats: Waverley House, 7-12 Noel Street, London, W1F 8GQ, UK ('Ecovis') –this is because Ecovis are Our accountants and We may share your personal data with Ecovis for reasons as set out in this Privacy Policy, in particular in order to comply with Our legal obligations.
- - Google LLC, Google Ireland Limited and Google Asia Pacific Pte. Ltd. (jointly as 'Google') – this is because your personal data may be stored in cloud computing systems operated by Google.
- - Any courier, the name of which will be indicated on the Website, for the purposes of delivering the products to you if you are based outside of the UK.

Where We transfer your data outside of the UK, We will ensure that the protection afforded to your personal data, by any third party processor who may receive your personal data, is not less comprehensive than the protection afforded by this Privacy Policy.

## **6. Data security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, We limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on Our instructions and they shall subject to a duty of confidentiality.

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

## **7. Data retention**

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes We collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal

data for a longer period in the event of a complaint or if We reasonably believe there is a prospect of litigation in respect to Our relationship with you.

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, and the applicable legal, regulatory, tax, accounting or other requirements. Typically, we may retain your personal data for a period of up to six years from the date of conclusion of our contract with Us or from closing of your account on the Website.

## **8. Your legal rights**

Under certain circumstances, you have rights under data protection laws in relation to your personal data:

- - Request access to your personal data.
- - Request correction of your personal data.
- - Request erasure of your personal data.
- - Object to processing of your personal data.
- - Request restriction of processing your personal data.
- - Request transfer of your personal data.
- - Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact Us using the contact information in this Privacy Policy.

### **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, We may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, We could refuse to comply with your request in these circumstances.

### **What We may need from you**

We may need to request specific information from you to help Us confirm your identity and ensure your right to access your personal data (or to exercise any of your other 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 speed up our response.

### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it could 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 LEGAL RIGHT**

You have the right to:

**Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data We hold about you and to check that We are lawfully processing it.

**Request correction** of the personal data that We hold about you. This enables you to have any incomplete or inaccurate data We hold about you corrected, though We may need to verify the accuracy of the new data you provide to Us.

**Request erasure** of your personal data. This enables you to ask Us to delete or remove 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 information unlawfully or where We are required to erase your personal data to comply with local law. 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, at the time of your request.

**Object to processing** of your personal data where We are relying on a legitimate interest (or those of a third party) 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. You also have the right to object where We are processing your personal data for direct marketing purposes. In some cases, We may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask Us to suspend the processing of your personal data in the following scenarios:

- - If you want Us to establish the data's accuracy.
- - Where our use of the data is unlawful but you do not want Us to erase it.
- - Where you need Us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- - You have objected to our use of your data but We need to verify whether We have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for Us to use or where We used the information to perform a contract with you.

**Withdraw consent at any time** where We are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, We may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.