

Privacy Policy - UK

Clevertronics International UK Ltd (Clevertronics) 11249539 and registered VAT number 303 6051 50 with the registered address of 843 Finchley Road, London. United Kingdom NW11 8NA issues this Privacy Notice to all Customers and Potential Customers for the purposes of providing clear information about collection, processing and storage of their personal data.

1. Purpose

Clevertronics is committed to protecting the privacy and security of your personal information.

This privacy notice aims to give you information on how Clevertronics (“we” or “us”) collects and processes personal information about you, whether gathered through interactions with you or your use of our website, in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA), collectively referred to as the Data Protection Regulations.

Our website is not intended for children, and we do not knowingly collect data relating to children.

2. Data Controller

Clevertronics is the Data Controller and responsible for your personal data.

3. Data we collect about you

Personal data, or personal information, means any information about a living, identifiable individual.

We only collect and use personal data when the law allows us to do so. While most of the information we collect is mandatory, there is some information that can be provided voluntarily. Whenever we seek to collect information from you, we make it clear whether providing it is mandatory or optional. If it is mandatory, we will explain the possible consequences of not complying.

The categories of information that we collect, process, hold and share include:

- Identity Data (e.g. your name, date of birth and other identification information)
- Contact Data (e.g. your postal address, phone number, email address and mobile number)
- Details of current and historic enquiries and orders you make for our products
- Financial and transaction information (e.g. your bank account number, credit- or debit-card numbers)
- Your interactions with us, including via social media
- Marketing and Communications Data including your contact preferences.

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We also collect, process, hold and share information gathered from your use of our website, including:

- Usage Data regarding how you use our website
- Technical Data including use of cookies

Aggregated Data such as statistical or demographic information is also collected, but is not personal data as it does not directly (or indirectly) reveal your identity. For example, we may aggregate individuals' Usage Data to calculate the percentage of users accessing a specific website feature in order to analyse general trends in how users are interacting with our website to help improve the website and our service offering.

- what you say (comments) or your actions (liking and sharing)
- your country or region (or your precise location if you have provided this in your user profile and you are logged in)
- your device and internet connection; and
- your social media profile details and user ID.

If you have allowed the use of tracking cookies on the social media platform, the information we collect will also include what you click on and what you view.

4. Special Category Data

Certain personal data (known as special categories of data) is subject to additional safeguards under data protection legislation. Such information includes details of

- your racial or ethnic origin;
- your political opinions;
- your religious beliefs or other beliefs of a similar nature;
- whether you are a member of a trade union;
- your physical or mental health or condition;
- your sexual life;
- the commission or alleged commission by you of any offence, or
- any proceedings for any offence committed or alleged to have been committed by you, the disposal of such proceedings or the sentence of any court in such proceedings.

It may be necessary for us to process such personal data in order to comply with legal or regulatory obligations (including making reasonable adjustments for customers with disabilities), because it is in the public interests, or if we need to do so in order to seek confidential legal advice, or establish or defend legal claims. In some cases we will process it on the basis that we have your consent to do so.

5. Cookies

We use cookies and similar technologies on our websites and apps, and in our emails. Cookies are text files that gather small amounts of information, which your computer or mobile device stores when you visit a website or use an app. When you return to the

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website or app, or visit websites and apps that use the same cookies, they recognise these cookies and your device.

We use cookies to do many different jobs, like letting you navigate between pages efficiently, remembering your preferences, and generally improving your online experience. They can also make sure that the adverts you see online are more relevant to you and your interests.

We also use cookies in some of our emails to help us understand how you interact with our emails and to help us improve our future email communications.

If you've allowed us to use cookies that support our marketing on social media platforms, it will allow the social media platform provider (such as Facebook) to collect information about you, your device and which of our web pages you have visited. This information allows us to show you relevant products and services on social media platforms.

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 this website may become inaccessible or not function properly.

6. How Data is Collected

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

- Direct interaction with our customers
- Via Automated technologies such as our use of Cookies.

We may also receive personal data from third parties and public sources, for example:

- People appointed to act on your behalf
- The entity you represent, where necessary for Clevertronics to provide its products and/or services to that entity through you
- Businesses you own or with which you are associated
- Contact and Financial Data from providers of technical, payment and delivery services
- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register.
- Publicly maintained record or other publicly available sources of information including social media and similar websites
- Analytical data from providers such as Google

Please note that our website may include links to third-party websites, plug-ins, and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

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7. How we use your personal data (our Legal basis)

We must have a legal basis to process your personal data. The legal basis applicable to processing by Clevertronics will usually be one of the following:

- To allow us to take actions that are necessary for us to provide you with the product or service you want (for example, to make and receive payments);
- To allow us to meet our legal obligations (for example, to fulfil regulatory reporting or similar obligations);
- To protect our legitimate interests (for example, to understand how customers use our services so that we can improve our offering, or to carry out debt recovery); or
- We have your consent to use your information (for example in relation to electronic marketing). To the extent that any processing is based on consent, you have the right to withdraw that consent at any time.

The table below sets our main uses for personal data and the legal bases for doing so. Where our legal basis is a legitimate interest, those interests are also referenced:

| Purpose for which data is processed | Legal basis for that processing |
|---|--|
| To provide our services to you or your business, including accounting, billing and other internal administrative purposes | <p>It is necessary to carry out our agreement or to take steps to enter into an agreement with you.</p> <p>It is in our legitimate interests to make sure that our customers are provided with a high standard of service, to protect our business interests and the interests of our customers.</p> |
| To communicate with you about products or services that you have requested or in which you may have an interest | <p>It is necessary to carry out our agreement or to take steps to enter into an agreement with you.</p> <p>It is in our legitimate interests to give you information about products that you may be interested in.</p> <p>In the case of electronic marketing (for example, emails), we have your consent.</p> |
| To manage complaints, queries and to take action to put matters right | <p>It is necessary to carry out our agreement or to take steps to enter into an agreement with you.</p> <p>It is required by law.</p> <p>It is in our legitimate interests to make sure that our customers are provided</p> |

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| | with a high standard of service, to protect our business interests and the interests of our customers. |
| <p>To check your instructions to us and for training and quality purposes</p> <p>Please note that we may monitor or record any communications between you and us, including phone calls, for these purposes.</p> | <p>It is necessary to carry out our agreement or to take steps to enter into an agreement with you.</p> <p>It is required by law.</p> <p>It is in our legitimate interests to make sure that our customers are provided with a high standard of service, to protect our business interests and the interests of our customers.</p> |
| <p>To develop and improve products, by assessing and analysing feedback received from you</p> | <p>It is in our legitimate interests to improve our products, so that we can continue to provide products that our customers want, and to continue to be competitive.</p> |
| <p>To recover debt and exercise other rights we have under any agreement with you.</p> | <p>It is necessary to carry out our agreement or to take steps to enter into an agreement with you.</p> <p>It is required by law.</p> <p>It is in our legitimate interests to recover debts owed to us to enable the continued running of the business and ensure that our assets are protected</p> |
| <p>To personalise marketing messages you receive so they are more relevant and interesting for you.</p> | <p>It is in our legitimate interests to provide information or the most relevant to customers.</p> |
| <p>To enable a merger, acquisition, change of control, joint venture or other similar arrangement involving our business.</p> | <p>It is in our legitimate interests to protect our business interests and conduct changes to our structure and ownership.</p> |
| <p>To identify you as the author of any testimonial provided by you and published on our website or elsewhere (provided you consent to such publication)</p> | <p>It is in our legitimate interests to promote our business.</p> <p>We have your consent.</p> |

To the extent that we process special categories of data, relevant purposes include:

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| Purpose for which data is processed | Legal basis for that processing |
|--|---|
| To manage complaints, queries and to take action to put matters right | It is necessary for the establishment, exercise or defence of legal claims. It is necessary in the public interest. You have provided your consent. |
| To keep to laws and regulations that apply to us, and to co-operate with regulators and law enforcement organisations. | It is necessary in the public interest. |

If you decide not to supply personal data that we have requested and as a result we are unable to comply with legal or regulatory obligations, then we may be unable to enter into a contract with you or continue communicating with you.

8. Sharing your personal information

Your personal data may be seen or used by our staff in the course of their duties, or others lawfully working with us in the ordinary course of our business.

We may share your personal data with others, such as credit reference agencies, in order to complete our client management processes.

We may need to share your data with appropriate third parties, for example professional advisers, auditors, insurers, contractual counterparties in order to fulfil our legal obligations. We may share your personal data with independent third-party service providers with whom you ask us to share information.

We may also need to share your data with your advisers (such as accountants, lawyers, insurers, and other professional advisers) who you have authorised to represent you, or any other person you have told us is authorised to give instructions on your behalf (such as under a power of attorney).

We may also outsource our support services or engage consultants and others to support us in our business (e.g. secretarial, marketing, courier or IT tasks). Where we do so, relevant personal data is be provided to and processed by the service provider in accordance with the terms of our contract with them and to the extent appropriate for the performance of that contract. They will not share your personal information with any organisation apart from us, unless required to by law. All personal data will be held securely and only retained for the period we instruct.

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We might need to share or transfer your data confidentially with relevant parties and/or their professional advisers if there is a merger, acquisition, change of control, joint venture or other similar arrangement involving Clevertronics.

We may need to share your personal information to obtain necessary confidential legal advice. We may also need to share your personal data with organisations such as insurers, government and law enforcement agencies or HMRC, to comply with insurance, legal, taxation, public interest or similar obligations. We will not share your information with any third parties for the purposes of direct marketing unless you have given consent for us to do so.

9. 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 we need to use your personal data for an unrelated purpose, we will explain to you the legal basis which allows us to do so.

10. Transfer of your data to other countries

Clevertronics operates in the United Kingdom, Australia and New Zealand. Accordingly, Clevertronics may disclose personal information to recipients in Australia and New Zealand to the extent necessary to provide its products and/or services and for administrative or other business management purposes.

Where data is being transferred outside of the UK and/or European Economic Area, we will take steps to ensure that your data is adequately protected in accordance with UK legal requirements and the EU GDPR (as applicable). Transfers from the United Kingdom to New Zealand are covered by a UK adequacy regulation which permits the transfer without the need for additional safeguards. At present, no adequacy decision have been granted to permit the free flow of data from the UK to Australia. As such, transfers to Australia, and any other countries which may not have the same legal protections for your data as the UK, will occur under the protection of appropriate safeguards, in the form of contractual protections and/or a transfer mechanism as permitted by the UK GDPR .

Otherwise, we may transfer your data if it is necessary for performance of our contractual duties to you, or because we have other legal obligations to transfer the data, or it is necessary for important reasons of public interest. If you require further detail about the protections in connection with any particular transfer, please contact us.

11. Data retention

We will only retain your personal data for as long as necessary to fulfil the purpose for which it was collected, including for the purposes of satisfying any legal, accounting, or reporting requirements. Data relating to a specific events or transaction will generally be retained for a period of 6 years following that event or transaction.

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To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data. We also consider any legal obligations to retain the data for a specific period. We consider 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.

We may be obliged to suspend any scheduled destruction or deletion of personal data where legal or regulatory proceedings require it or where proceedings are underway such as require the data to be retained until those proceedings have finished.

DATA SUBJECT RIGHTS Under the Data Protection Regulations, Data Subjects have the following rights:

- Access to personal data
- Rectification of incorrect data
- Erasure of time elapsed data
- Restriction of processing under certain circumstances
- To object to certain processing of data
- To data portability
- To complain to a supervisory authority – in the UK this is the UK Information Commissioner
- To withdraw consent

Some of these rights are not automatic, and we reserve the right to discuss with you why we might not comply with a request from you to exercise them.

To request access to your data or to exercise any of your rights, please contact privacy@clevertronics.com.au preferably in writing. 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).

If you have any questions about this privacy notice, the practices of our website or your dealings with this web site, please contact privacy@clevertronics.com.au.

12. Complaints

If you have any concerns regarding our use of your personal data, please contact the Data Privacy Manager in the first instance to allow us to address your concerns on +61 (3) 9559 2767.

You have the right to make a complaint to the ICO if you are unhappy with how we have used your data or how we have addressed your concerns:

Information Commissioner's Office

Wycliffe House

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Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

13. Policy Review

The Company reserves the right to vary or replace this policy or parts of the policy from time to time. This policy replaces any previous versions of the Privacy Policy - UK currently in circulation.

Any questions please contact hr@clevertronics.com.au

| Issue No. | Issue Date | Amendments | Approved By |
|-----------|------------|------------|-------------|
| 01 | | New Policy | Tony Todaro |
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