# **Privacy policy**

This privacy policy applies between you, the User of this Website <u>https://www.</u> <u>4tress4gates.com</u> and Stephen Douglas of 4tress4gates Ltd Trading as 4tress4gates & 4tress4u, the owner and provider of this Website. Stephen Douglas of 4tress4gates Ltd Trading as 4tress4gates and 4tress4u takes the privacy of your information very seriously. This privacy policy applies to our use of any and all Data collected by us or provided by you in relation to your use of the Website.

This privacy policy should be read alongside, and in addition to, our Terms and Conditions, which can be found at: <u>Terms and Conditions</u>.

### Please read this privacy policy carefully.

# **Definitions and interpretation**

1. In this privacy policy, the following definitions are used:

Data	Collectively all information that you submit to Stephen Douglas of 4tress4gates Ltd Trading as 4tress4gates & 4tress4u via the Website. This definition incorporates, where applicable, the definitions provided in the Data Protection Laws;	
Cookies	A small text file placed on your computer by this Website when you visit certain parts of the Website and/or when you use certain features of the Website. Details of the cookies used by this Website are set out in the clause below ( <b>Cookies</b> );	
Data Protection Laws	any applicable law relating to the processing of personal Data, including but not limited to the Directive 96/46/EC (Data Protection Directive) or the GDPR, and any national implementing laws, regulations and secondary legislation, for as long as the GDPR is effective in the UK;	
GDPR	the General Data Protection Regulation (EU) 2016/679;	
Stephen Douglas of Solarcanopy Limited Trading as 4tress4gates & 4tress4u, or us		
UK and EU Cookie Law	the Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended by the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011;	
User or you	any third party that accesses the Website and is not either (i) employed by Stephen Douglas of 4tress4gates Ltd Trading as 4tress4gates and 4tress4u and acting in the course of their employment or (ii) engaged as a consultant or otherwise providing services to Stephen Douglas of 4tress4gates Ltd Trading as 4tress4gates and 4tress4u and accessing the Website in connection with the provision of such services; and	

Website	The website that you are currently using, <u>www.4tress4gates.com</u>
	and any sub-domains of this site unless expressly excluded by
	their own terms and conditions.

- 2. In this privacy policy, unless the context requires a different interpretation:
  - a.the singular includes the plural and vice versa;
  - b.references to sub-clauses, clauses, schedules or appendices are to sub-clauses, clauses, schedules or appendices of this privacy policy;
  - c.a reference to a person includes firms, companies, government entities, trusts and partnerships;
  - d."including" is understood to mean "including without limitation";
  - e.reference to any statutory provision includes any modification or amendment of it;
  - f. The headings and sub-headings do not form part of this privacy policy.

# Scope of this privacy policy

- 3. This privacy policy applies only to the actions of Stephen Douglas of 4tress4gates Ltd Trading as 4tress4gates and 4tress4u and Users with respect to this Website. It does not extend to any websites that can be accessed from this Website including, but not limited to, any links we may provide to social media websites.
- 4.For purposes of the applicable Data Protection Laws, Stephen Douglas of 4tress4gates Ltd Trading as 4tress4gates and 4tress4u is the "data controller". This means that Stephen Douglas of 4tress4gates Ltd Trading as 4tress4gates & 4tress4u determines the purposes for which, and the manner in which, your Data is processed.

### Data collected

5.We may collect the following Data, which includes personal Data, from you:

a.name;

b.date of birth;

c.gender;

d.job title;

e.profession;

f.contact Information such as email addresses and telephone numbers;

g.demographic information such as postcode, preferences and interests;

h.IP address (automatically collected);

i.web browser type and version (automatically collected);

j.operating system (automatically collected);

- k.a list of URLs starting with a referring site, your activity on this Website, and the site you exit to (automatically collected);
- I.In each case, in accordance with this privacy policy.

# How we collect Data

- 6.We collect Data in the following ways:
  - a.data is given to us by you; and
  - b.Data is collected automatically.

# Data that is given to us by you

- 7.Stephen Douglas of 4tress4gates Ltd Trading as 4tress4gates and 4tress4u will collect your Data in a number of ways, for example:
  - a.when you contact us through the Website, by telephone, post, e-mail or through any other means;
  - b.when you register with us and set up an account to receive our products/services;
  - c.when you enter a competition or promotion through a social media channel;
  - d.when you make payments to us, through this Website or otherwise;
  - e.when you elect to receive marketing communications from us;
  - f.when you use our services;

In each case, in accordance with this privacy policy.

# Data that is collected automatically

- 8.To the extent that you access the Website, we will collect your Data automatically, for example:
  - a.We automatically collect some information about your visit to the Website. This information helps us to make improvements to Website content and navigation, and includes your IP address, the date, times and frequency with which you access the Website and the way you use and interact with its content.
  - b.We will collect your Data automatically via cookies, in line with the cookie settings on your browser. For more information about cookies, and how we use them on the Website, see the section below, headed "Cookies".

# Our Use of Data

9.Any or all of the above Data may be required by us from time to time in order to provide you with the best possible service and experience when using our Website. Specifically, Data may be used by us for the following reasons:

a.internal record keeping;

b.improvement of our products / services;

- c.transmission by email of marketing materials that may be of interest to you;
- d.Contact for market research purposes which may be done using email, telephone, fax or mail. Such information may be used to customise or update the Website;

In each case, in accordance with this privacy policy.

- 10.We may use your Data for the above purposes if we deem it necessary to do so for our legitimate interests. If you are not satisfied with this, you have the right to object in certain circumstances (see the section headed "Your rights" below).
- 11.For the delivery of direct marketing to you via e-mail, we'll need your consent, whether via an opt-in or soft-opt-in:
  - a.Soft opt-in consent is a specific type of consent which applies when you have previously engaged with us (for example, you contact us to ask us for more details about a particular product/service, and we are marketing similar products/services). Under "soft opt-in" consent, we will take your consent as given unless you opt-out.
  - b.For other types of e-marketing, we are required to obtain your explicit consent; that is, you need to take positive and affirmative action when consenting by, for example, checking a tick box that we'll provide.
  - c.If you are not satisfied about our approach to marketing, you have the right to withdraw consent at any time. To find out how to withdraw your consent, see the section headed "Your rights" below.
- 12. When you register with us and set up an account to receive our services, the legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.
- 13.We may use your Data to show you Stephen Douglas of 4tress4gates Ltd Trading as 4tress4gates and 4tress4u adverts and other content on other websites. If you do not want us to use your data to show you Stephen Douglas of 4tress4gates Ltd Trading as 4tress4gates and 4tress4u adverts and other content on other websites, please turn off the relevant cookies (please refer to the section headed "Cookies" below).

# Who we share Data with

14.We may share your Data with the following groups of people for the following reasons:

- a.our employees, agents and/or professional advisors to obtain advice from professional advisors;
- b.relevant authorities to facilitate the detection of crime or the collection of taxes or duties;

In each case, in accordance with this privacy policy.

# **Keeping Data secure**

15.We will use technical and organisational measures to safeguard your Data, for example:

- a.Access to your account is controlled by a password and a user name that is unique to you.
- b.We store your Data on secure servers.
- 16.Technical and organisational measures include measures to deal with any suspected data breach. If you suspect any misuse or loss or unauthorised access to your Data, please let us know immediately by contacting us via this e-mail address: <a href="steve@4tress4gates.com">steve@4tress4gates.com</a>.
- 17.If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit <u>www.getsafeonline.org</u>. Get Safe Online is supported by HM Government and leading businesses.

# **Data retention**

- 18.Unless a longer retention period is required or permitted by law, we will only hold your Data on our systems for the period necessary to fulfil the purposes outlined in this privacy policy or until you request that the Data be deleted.
- 19.Even if we delete your Data, it may persist on backup or archival media for legal, tax or regulatory purposes.

# Your rights

20.You have the following rights in relation to your Data:

- a.Right to access the right to request (i) copies of the information we hold about you at any time, or (ii) that we modify, update or delete such information. If we provide you with access to the information we hold about you, we will not charge you for this, unless your request is "manifestly unfounded or excessive." Where we are legally permitted to do so, we may refuse your request. If we refuse your request, we will tell you the reasons why.
- b.**Right to correct** the right to have your Data rectified if it is inaccurate or incomplete.
- c.**Right to erase** the right to request that we delete or remove your Data from our systems.
- d.**Right to restrict our use of your Data** the right to "block" us from using your Data or limit the way in which we can use it.
- e.**Right to data portability** the right to request that we move, copy or transfer your Data.
- f.Right to object the right to object to our use of your Data including where we use it for our legitimate interests.
- 21.To make enquiries, exercise any of your rights set out above, or withdraw your consent to the processing of your Data (where consent is our legal basis for processing your Data), please contact us via this e-mail address: <a href="mailto:steve@4tress4gates.com">steve@4tress4gates.com</a>.
- 22.If you are not satisfied with the way a complaint you make in relation to your Data is

handled by us, you may be able to refer your complaint to the relevant data protection authority. For the UK, this is the Information Commissioner's Office (ICO). The ICO's contact details can be found on their website at <u>ico.org.uk/</u>.

23.It is important that the Data we hold about you is accurate and current. Please keep us informed if your Data changes during the period for which we hold it.

# Links to other websites

24. This Website may, from time to time, provide links to other websites. We have no control over such websites and are not responsible for the content of these websites. This privacy policy does not extend to your use of such websites. You are advised to read the privacy policy or statement of other websites prior to using them.

# Changes of business ownership and control

- 25.Stephen Douglas of 4tress4gates Ltd Trading as 4tress4gates and 4tress4u 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 Stephen Douglas of 4tress4gates Ltd Trading as 4tress4gates and 4tress4u. Data provided by Users will, where it is relevant to any part of our business so 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 the Data for the purposes for which it was originally supplied to us.
- 26.We may also disclose Data to a prospective purchaser of our business or any part of it.
- 27.In the above instances, we will take steps with the aim of ensuring your privacy is protected.

# Cookies

- 28. This Website may place and access certain Cookies on your computer. Stephen Douglas of 4tress4gates Ltd Trading as 4tress4gates and 4tress4u uses Cookies to improve your experience of using the Website and to improve our range of products and services. Stephen Douglas of 4tress4gates Ltd Trading as 4tress4gates and 4tress4u has carefully chosen these Cookies and has taken steps to ensure that your privacy is protected and respected at all times.
- 29.All Cookies used by this Website are used in accordance with current UK and EU Cookie Law.
- 30.Before the Website places Cookies on your computer, you will be presented with a message bar requesting your consent to set those Cookies. By giving your consent to the placing of Cookies, you are enabling Stephen Douglas of 4tress4gates Ltd Trading as 4tress4gates and 4tress4u to provide a better experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of the Website may not function fully or as intended.
- 31. This Website may place the following Cookies:

Type of Cookie	Purpose	
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Strictly necessary cookies	These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.
Analytical/ performance cookies	They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
Functionality cookies	These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
Targeting cookies	These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

- 32. You can find a list of Cookies that we use in the Cookies Schedule.
- 33.You can choose to enable or disable Cookies in your internet browser. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser.
- 34.You can choose to delete Cookies at any time; however you may lose any information that enables you to access the Website more quickly and efficiently including, but not limited to, personalisation settings.
- 35.It is recommended that you ensure that your internet browser is up-to-date and that you consult the help and guidance provided by the developer of your internet browser if you are unsure about adjusting your privacy settings.
- 36.For more information generally on cookies, including how to disable them, please refer to aboutcookies.org. You will also find details on how to delete cookies from your computer.

# General

- 37.You may not transfer any of your rights under this privacy policy to any other person. We may transfer our rights under this privacy policy where we reasonably believe your rights will not be affected.
- 38.If any court or competent authority finds that any provision of this privacy policy (or part of any provision) is invalid, illegal or unenforceable, that provision or part-provision will, to the extent required, be deemed to be deleted, and the validity and enforceability of the other provisions of this privacy policy will not be affected.
- 39.Unless otherwise agreed, no delay, act or omission by a party in exercising any right or remedy will be deemed a waiver of that, or any other, right or remedy.
- 40. This Agreement will be governed by and interpreted according to the law of England and

Wales. All disputes arising under the Agreement will be subject to the exclusive jurisdiction of the English and Welsh courts.

# Changes to this privacy policy

41.Stephen Douglas of 4tress4gates Ltd Trading as 4tress4gates and 4tress4u reserves the right to change this privacy policy as we may deem necessary from time to time or as may be required by law. Any changes will be immediately posted on the Website and you are deemed to have accepted the terms of the privacy policy on your first use of the Website following the alterations.You may contact Stephen Douglas of S4tress4gates Ltd Trading as 4tress4gates and 4tress4u by email at <a href="steve@4tress4gates.com">steve@4tress4gates.com</a>

# Attribution

42. This privacy policy was created using a document from Rocket Lawyer (<u>www.rocketlawyer.co.uk</u>).

### 23 August 2019

# Cookies

Below is a list of the cookies that we use. We have tried to ensure this is complete and up to date, but if you think that we have missed a cookie or there is any discrepancy, please let us know.

# We use the following strictly necessary cookies:

Google Analytics Cookie Usage on Websites This document describes how Google Analytics uses cookies to measure user-interactions on websites.

# Overview

Google Analytics is a simple, easy-to-use tool that helps website owners measure how users interact with website content. As a user navigates between web pages, Google Analytics provides website owners JavaScript tags (libraries) to record information about the page a user has seen, for example the URL of the page. The Google Analytics JavaScript libraries use HTTP Cookies to "remember" what a user has done on previous pages / interactions with the website.

**Important**: Read the <u>Google Analytics privacy</u> document for more details about the data collected by Google Analytics.

Google Analytics supports three JavaScript libraries (tags) for measuring website usage: gtag.js, analytics.js, and ga.js. The following sections describe how each use cookies.

gtag.js and analytics.js - cookie usage

The analytics.js JavaScript library is part of Universal Analytics and uses *first-party* cookies to:

- Distinguish unique users
- Throttle the request rate

When using the recommended JavaScript snippet, gtag.js and analytics.js set cookies on the highest level domain they can. For example, if your website address is blog.example.co.uk, analytics.js will set the cookie domain to .example.co.uk. Setting cookies on the highest level domain possible allows users to be tracked across subdomains without any extra configuration.

**Note**: gtag.js and analytics.js do not require setting cookies to transmit data to Google Analytics.

Cookie Name	Expiration Time	Description
_ga	2 years	Used to distinguish users.
_gid	24 hours	Used to distinguish users.
_gat	1 minute	Used to throttle request rate. If Google Analytics is deployed via Google Tag Manager, this cookie will be named _dc_gtm_ <property-id>.</property-id>
AMP_TOKEN	30 seconds to 1 year	Contains a token that can be used to retrieve a Client ID from AMP Client ID service. Other possible values indicate opt-out, inflight request or an error retrieving a Client ID from AMP Client ID service.
_gac_ <property-id></property-id>	90 days	Contains campaign related information for the user. If you have linked your Google Analytics and Google Ads accounts, Google Ads website conversion tags will read this cookie unless you opt-out. Learn more.

gtag.js and analytics.js set the following cookies:

### Customization

Read the analytics.js Domains & Cookies developer guide to learn all the ways these default settings can be customized.

Read the Security and privacy in Universal Analytics document for more information about Universal Analytics and cookies.

### ga.js - cookie usage

The ga.js JavaScript library uses first-party cookies to:

- Determine which domain to measure
- Distinguish unique users
- Throttle the request rate
- Remember the number and time of previous visits

- Remember traffic source information
- Determine the start and end of a session
- Remember the value of visitor-level custom variables

By default, this library sets cookies on the domain specified in the document.host browser property and sets the cookie path to the root level (/). This library sets the following cookies:

Cookie Name	Default Expiration Time	Description
utma	2 years from set/update	Used to distinguish users and sessions. The cookie is created when the javascript library executes and no existingutma cookies exists. The cookie is updated every time data is sent to Google Analytics.
utmt	10 minutes	Used to throttle request rate.
utmb	30 mins from set/update	Used to determine new sessions/visits. The cookie is created when the javascript library executes and no existingutmb cookies exists. The cookie is updated every time data is sent to Google Analytics.
utmc	End of browser session	Not used in ga.js. Set for interoperability with urchin.js. Historically, this cookie operated in conjunction with theutmb cookie to determine whether the user was in a new session/visit.
utmz	6 months from set/update	Stores the traffic source or campaign that explains how the user reached your site. The cookie is created when the javascript library executes and is updated every time data is sent to Google Analytics.
utmv	2 years from set/update	Used to store visitor-level custom variable data. This cookie is created when a developer uses the <u>_setCustomVar</u> method with a visitor level custom variable. This cookie was also used for the deprecated _setVar method. The cookie is updated every time data is sent to Google Analytics.

### Customization

The following methods can be used to customize how cookies are set:

- \_\_setDomainName Sets the domain to which all cookies will be set.
- \_\_\_\_\_setCookiePath Sets the path to which all cookies will be set.
- <u>\_setVisitorCookieTimeout</u> Sets the Google Analytics visitor cookie expiration in milliseconds.
- \_\_\_\_\_setSessionCookieTimeout Sets the new session cookie timeout in milliseconds.

- <u>setCampaignCookieTimeout</u> Sets the campaign tracking cookie expiration time in milliseconds.
- \_\_\_\_\_\_storeGac Pass in false to disable the GAC cookie. Defaults to true

Read the Tracking Multiple Domains guide to learn how to configure ga.js to measure user interaction across domains.

#### urchin.js - cookie usage

Historically, Google Analytics provided a JavaScript measurement library named urchin.js. When the newer ga.js library launched, developers were encouraged to migrate to the new library. For sites that have not completed the migration, urchin.js sets cookies identically to what is set in ga.js. Read the ga.js cookie usage section above for more details.

#### Google Analytics for Display Advertisers - cookie usage

For customers that are using Google Analytics' Display Advertiser features, such as remarketing, a *third-party* DoubleClick cookie is used in addition to the other cookies described in this document for just these features. For more information about this cookie, visit the Google Advertising Privacy FAQ.

#### Content Experiments - cookie usage

For websites using Google Analytics content experiments, the following cookies are used for these features in addition to the other cookies described in this document:

Cookie Name	Expiration Time	Description
utmx	18 months	Used to determine a user's inclusion in an experiment.
utmxx	18 months	Used to determine the expiry of experiments a user has been included in.

#### Optimize 360 - cookie usage

For websites using Optimize 360, the following cookie is used in addition to the other cookies described in this document:

Cookie Name	Expiration Time	Description
_gaexp	Depends on the length of the experiment but typically 90 days.	Used to determine a user's inclusion in an experiment and the expiry of experiments a user has been included in.

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and code samples are licensed under the Apache 2.0 License. For details, see our Site Policies. Java is a registered trademark of Oracle and/or its affiliates. Last updated August 9, 2018.

# Email marketing messages and subscriptions

Under the GDPR reuse the consent lawful basis for anyone subscribing to our newsletter or marketing mailing list. We only collect certain data about you, as detailed in the "Processing of your personal data" above. Any email marketing messages we send are done so through an EMS, email marketing service provider. An EMS is a third party service provider of software/applications that allows marketeers to send out email marketing campaigns to a list of users.

Email marketing messages that we send may contain tracking beacons/tracked clickable links or similar server technologies in order to track subscriber activity within email marketing messages. Where used, such marketing messages may record a range of data such as: times, dates. Such data, within its limitations will show the activity each subscriber made for that email campaign.

Any email marketing messages we send are in accordance with the GDPR and the PECR. We provide you with an easy method to withdraw your consent (unsubscribe) or manage your preference / the information we hold about you at any time. See any marketing messages for instructions on how to unsubscribe or manage your preferences, you can also Unsubscribe from all Direct Mail Lists. By following this link, otherwise contact the EMS provider.

Our EMS provider is Direct Mail. We hold the following information about you within our EMS system;

- Email address
- Your Name
- · I.P address
- Subscription time & date
- · What Product you are interested in

You are free to opt out of any of our communication at anytime by emailing <a href="mailto:steve@4tress4gates.com">steve@4tress4gates.com</a>