

# PRIVACY AND COOKIE POLICY

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This privacy policy governs the collection and use of personal information by Aqua Pacific UK Ltd (Brands: Aqua One, Pond One, Reptile One, Avi One, Pet One)

This privacy policy explains the types of personal information we collect, how we use that information, who we share it with, how we protect that information, and your legal rights in relation to your information. We are committed to abiding by the requirements of applicable laws, in the operation of our business, set out by the latest guidance from the ICO in regard to the General Data Protection Regulation GDPR. Please read this policy carefully as it explains our views and practices regarding your personal information and how it is handled. By accessing or browsing our websites, applying for extended warranty, entering into one of our competitions or purchasing products from us directly or through a third party website such as Amazon or Ebay, you confirm that you have read, understood and agree to this privacy policy in its entirety. If you do not agree with the practices described in this policy, you should not use our website/s.

## **Who we are**

Aqua Pacific UK Ltd, Unit 1 Mauretania Road, Nursling Industrial Estate, Southampton, SO16 0YS

## **Information covered by this policy**

This policy covers all personal information collected. In this policy "personal information" means information that (either in isolation or in combination with other information held by us) enables you to be identified as an individual or recognised directly or indirectly. This may include your name, sex, postal address, email address, computer IP address, phone number, login information and technical information from the devices you use to receive our services.

## **Collection of personal information**

We may collect information about you from different sources detailed below.  
We act as a Data processor.

## **Information you give us:**

When you access and browse our websites (including when you register or fill in forms on our websites) and when you correspond with us by phone or email or other electronic means, you may give us information about yourself. The information you give us may include your name, postal address, email address, landline and/or mobile telephone number, delivery details, access requirements and information about your employment (including your job title, responsibilities and employer's details) as well as other personal information which is required but not listed. This is not an exhaustive list.

## **Information we collect about you:**

With regard to each of your visits to our website(s), we may also use cookies and other technologies to automatically collect the following information:  
Technical information, including the Internet protocol (IP) address used to connect your computer to the internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating systems and platform; and information about your visit, including the full URL, on and from our websites, products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks and mouse-overs), methods used to browse away from the page and any phone number used to call us.

## **Information we receive and collect from other sources:**

We may receive information about you from other websites operated by us. We also work closely with third parties such as payment processors and app providers and may receive information about you from them. We may also collect information about you from publicly available sources, including publicly available content on social media.

## **Cookies**

Our websites use cookies to distinguish you from other users. This helps us to provide you with a good experience when you browse the websites and also allows us to improve our websites.

## **LIA**

We have conducted a legitimate interest assessment (**LIA**), to ensure that we can justify our decisions. We will review our LIA every twelve months.

Based upon that assessment it is deemed that the rights and freedoms of the data would not be overridden in our processing of the personal data and that in no way cause harm.

## **Transfers of personal information**

We may share your personal information within our organisation, in order to enable you to access the services, provide you with customer support and conduct the other activities described in this privacy policy. We use other companies, agents or contractors ("Service Providers") to perform services on our behalf or to assist us with the provision of services to you. For example, we may engage Service Providers to deliver goods, marketing (including competitions), advertising, communications, event management (including logistics, health and safety and audio-visual services), meetings and bookings (including accommodation), training, IT, hosting and other infrastructure, subscription and discount management, payment processing, and data cleansing and processing services. In the course of providing such services, these Service Providers may have access to your personal information. These third parties are contractually bound only to use personal information to perform these services.

We may also disclose your personal information to third parties:

- in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
- if we sell the company and all of its assets are acquired by a third party, in which case personal data about its customers will be one of the transferred assets; and
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation or in order to enforce our terms and conditions or other agreements, or to protect the rights, property or safety of the company.

## **Where we store your data**

The data that we collect from you may be transferred to, and stored at, a destination outside the EEA. This destination would be our head office in Sydney, Australia. It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the provision of services to you or the processing of your payment details. We will take all steps that are mandatory or reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy and applicable data protection laws, including, where relevant, entering into EU standard contractual clauses (or equivalent measures) with the party outside the EEA receiving the data.

## **Security of personal information**

We use administrative and technical means to safeguard personal information against loss, theft and unauthorised uses, access or modifications, including an independent third-party IT contractor. Certain areas of our websites may be password protected. Where we have given you (or where you have chosen) a password, you are responsible for keeping this password confidential. We ask you not to share your password(s) with anyone.

## **Payments**

No payments can be made via our websites. If you wish to make a credit card payment it will be over the phone. All payments are processed in a secure environment using software provided by third party providers. We do not store your credit card details between transactions.

## **Third party websites and apps**

Our websites may contain links to and from third party websites and we may provide you with details of apps provided by third parties. Please note that if you follow a link to any of these websites or download an app, these websites and apps will have their own terms of use and privacy policies and that we do not accept any responsibility of liability for these policies. Please check these policies before you submit any personal data to these websites or apps.

## **Your rights**

You have the following rights with respect to the personal information that we hold about you:

### **Your right to access the information we hold about you**

You have the right to ask us whether or not we process your personal data and to request information on the purposes of data processing as well as confirmation on whether we use your personal information for these purposes only.

You can request access to the information we hold about you by contacting us using the contact details set out below. We will endeavour to make our file of your information available to you within 1 month, although occasionally we may not be able to give you access to the personal information we hold about you (for example, we may not be able to give you access if it would unreasonably affect someone else's privacy or if giving you access poses a serious threat to someone's life, health or safety).

You also have the right to be informed of the third parties to which we transfer your personal data within the scope of this privacy policy.

### **Your right to have your information corrected or deleted**

If you have an account with us, you can email us to update or delete your personal information or to request that third parties which hold your information within the scope of this privacy policy update or delete your information. Please send this info to [sales@aquapacific.co.uk](mailto:sales@aquapacific.co.uk) and we will action it as soon as possible.

### **Your right to object to us processing your data**

You have the right to ask us to stop processing your data, even where that processing is necessary for our legitimate interests (for example, where the processing is necessary for the legitimate commercial objectives we pursue in the course of our business), including the profiling we undertake to send you personalised offers, product recommendations and similar content. You also have the right to object to any results of a processing activity that prejudice your rights and that are conducted exclusively through automated systems. You also have the right to ask us to stop processing your data for direct marketing purposes, including any profiling we undertake for the purposes of direct marketing. We will in any case only send you marketing communications if you have previously agreed to this, but if you change your mind you can easily unsubscribe from our marketing communications at any time by following the instructions included in these marketing communications.

### **Your right to have your data transmitted to another organisation**

Where we hold personal information about you with your consent or for the performance of a contract with you, you also have the right to ask us to provide you with the personal information we hold about you in a structured, commonly used and machine-readable format and, where technically feasible, to transmit that data to another organisation.

## **Making a complaint**

You have the right to lodge a complaint with the data protection authorities if you believe that we have not complied with applicable data protection laws. Please email your complaint to [sales@aquapacific.co.uk](mailto:sales@aquapacific.co.uk) with the subject line *Data Protection Issue*.

**Changes to our privacy policy**

We reserve the right to amend this privacy policy at our sole discretion, without prior notice to you. Your continued use of our services or our websites following the posting of changes to these terms means that you consent to those changes.

**Contact us**

If you have any questions about this privacy policy, or if you would like to contact our DPO email [sales@aquapacific.co.uk](mailto:sales@aquapacific.co.uk) and use the subject line *Data Protection Officer*.

**We may use your personal information to:**

**How do we use personal information for this purpose?**

**What is the legal basis for us processing your information in this way?**

Provide you with goods and services	We will need to use your personal information where this is necessary for us to perform our services with you, for example where you have requested/purchased services from us, and to ensure your requirements are met.	Using your personal information in this way is necessary for us to perform our obligations to you.
Ensure that your requirements are met	We may use your personal information to better understand your requirements and preferences, so that we can provide you with a tailored experience.	It is in our legitimate interests to look at your requirements so that we can personalise our services for you, to better meet your needs as a customer.
Complete orders, subscriptions to newsletters, competition entries you make through our website	We will need to use your contact information (such as your email address or postal address) to assist you with any orders, subscriptions, competition entries you make through our website.	Using your personal information in this way is necessary for us to perform our contractual obligations to you.
Process your payments and protect against fraudulent transactions	We may need to process your personal information in order to keep your payments safe and secure and protect against fraudulent transactions.	It is in our legitimate interests to process personal information to keep our customers' payments secure.
Contact you to tell you about our special offers or other goods and services	We will need to use your personal information (such as your email address and/or telephone number) to send you information about services that you may be interested in. We will never sell or give your information to third parties unless it is absolutely necessary to perform the requested transaction or to comply with a legal requirement.	Using your personal information in this way is our legitimate interest for us to provide you with the best possible information about our products and services.
Diagnose problems with our server or administer our websites	We may need to use personal information, such as your IP address, to diagnose server problems or administer our websites.	We will ask for your consent to the use of cookies before processing.
Analyse user traffic to measure use of our websites and to improve the content of our websites and our services	We may sometimes use your personal information (e.g. your IP address) to measure use of our websites and assess the effectiveness of our site pages, including advertising on our sites. We may also use this personal information to improve the content of our websites and services.	It is in our legitimate interest to look at user traffic so that we can improve our websites and better meet your needs as a customer.
Comply with legal requirements and exercise or defend legal claims	We may sometimes need to process personal information to comply with legal requirements to which we are subject (for example, in relation to health and safety).	It is in our legitimate interests to process personal data for the purposes of complying with legal requirements to which we are subject.

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