

PRIVACY AND COOKIES POLICY

James Frew Limited ("we") are committed to protecting and respecting your privacy.

This policy sets out the basis on which personal information will be processed by us. Please read the following carefully to understand what we will do with your personal information. This policy covers the James Frew website and does not extend to links to other websites from this site.

By visiting www.jamesfrew.co.uk you accept this policy.

We are the data controller for the purposes of data protection legislation.

INFORMATION WE COLLECT FROM YOU

We will collect and process the following information about you:

- **Information you give to us.** We collect information you give us when you subscribe to our services, fill in forms on our site www.gassure.com (**our site**) or correspond with us by phone, e-mail or otherwise. The information you give us may include your name, address, e-mail address and phone number, financial and credit card information.

We may request further information from you where this is required for the purpose of your contract with us. If we do not receive the necessary information to provide our services to you, we may either not be able to enter into a contract to provide the services to you or may terminate our contract with you.

- **Information we collect about you.** With regard to each of your visits to our site we will automatically collect the following information:
 - technical information about your Internet protocol (IP) address, browser type and settings;
 - information about your visit, including the pages and products you viewed, length of time spent on each page and page interaction information, and any phone number used to call our customer service number.
- **Information we receive from other sources.** We combine your personal information received from our site with other information we hold about you or which we may receive from third parties.

COOKIES

Our site uses cookies and session variables. This helps us to provide you with a good experience when you browse our site and also allows us to improve our site.

We use cookies that are required for the operation of our site. They include, for example, cookies that enable you to purchase services from our website. We also use cookies to recognise you when you return to our site.

You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

USES MADE OF THE INFORMATION

Our legal grounds for our processing of your personal information are:

- consent, where you have agreed to us using your personal information; or
- the processing is necessary for the performance of a contract with us to which you are party or in order to take steps at your request prior to entering into a contract with us; or
- the processing is necessary for compliance with a legal obligation to which we are subject; or
- the processing is necessary for the purposes of our legitimate interests or those of a third party, such as enforcing our rights under our contract with you, maintaining our relationship with you as a service

provider, marketing our services, web analytics and optimisation, updating and verifying your details, providing you with relevant information about our services and assessing whether to enter into a contract with you.

On the basis of the above legal grounds, we use your personal information in the following ways:

- **Information you give to us.** We will use this information:
 - to perform any contracts entered into between you and us and to provide you with information, goods and services;
 - to carry out credit checks;
 - to provide you with information about our offers;
 - to provide you with information about other products and services we offer that are similar to those that you have already purchased or enquired about;
 - to notify you about changes to our service; and
 - to ensure that content from our site is presented in the most effective manner for you and for your device.
- **Information we collect about you.** We will use this information:
 - to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
 - to improve our site to ensure that content is presented in the most effective manner for you and for your device;
 - as part of our efforts to keep our site safe and secure;
 - to make suggestions and recommendations to you about goods or services that may interest you.
- **Information we receive from other sources.** We will combine information we receive from third parties with information you give to us and information we collect about you. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).

DISCLOSURE OF YOUR INFORMATION

You agree that we will share your personal information with:

- Selected third parties including:
 - business partners, suppliers and contractors for the performance of any contract we enter into with you or with them, such as our sub-contractors and engineers who provide the services to you;
 - analytics and search engine providers that assist us in the improvement and optimisation of our site;
 - our providers of hosting services;
 - credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you.

We will disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we will disclose your personal information to the prospective seller or buyer of such business or assets.
- If James Frew Limited or substantially all of its assets are acquired by a third party, in which case personal information held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal information in order to comply with any legal obligation, or in order to enforce or apply our subscription agreement and other agreements; or to protect the rights, property, or safety of James Frew Limited, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

WHERE WE STORE YOUR PERSONAL INFORMATION

The information that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for one of our suppliers. This includes staff engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal information, you agree to this transfer, storing or processing. We and our suppliers will take all steps reasonably necessary to ensure that your information is treated securely and in accordance with this privacy policy.

All information you provide to us is stored on secure servers. Any payment transactions will be encrypted.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your information transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

HOW LONG WE HOLD YOUR INFORMATION

We will delete or destroy your information once it is no longer required for the purposes for which we collected such information. If you would like us to delete or destroy your information, please contact us.

YOUR RIGHTS

You have the following rights in respect of the personal information we process about you:

- the right to access information held about you;
- the right to request us to rectify any personal data concerning you which is inaccurate;
- the right to request us to erase personal information concerning you (in certain conditions);
- the right to object to the processing of your information by us as well as the right to request us to restrict the extent to which we process your personal data (both in certain conditions);
- the right to data portability (in certain conditions);
- the right to ask us not to process your personal information for marketing purposes. We will usually inform you (at the time of collecting information) if we intend to use your information for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your information or at any time by contacting us;
- where you have provided your consent to us for us to process your personal data, you have the right to withdraw your consent by informing us; and
- the right to lodge a complaint with the Information Commissioner's Office in the UK.

These rights can be exercised in accordance with data protection laws.

CHANGES TO OUR PRIVACY AND COOKIES POLICY

Any changes we make to our privacy and cookies policy in the future will be posted on this page and where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy and cookies policy.

CONTACT

Our contact details are:

Address: James Frew Limited, 83 New Street, Stevenston. KA20 3HD

E-Mail: info@jamesfrew.co.uk

Questions, comments and requests regarding this privacy and cookies policy are welcomed and should be addressed to the Company Secretary, E-Mail: admin@jamesfrew.co.uk