



## Privacy Policy

This is the privacy policy of Oricom Ltd. In this document, “we”, “our”, or “us” refer to [Oricom Ltd.](#) We are company number [SC341694](#) registered in [Scotland](#). Our registered office is at [1 Cockburn Place, Riverside Business Park, Irvine, Ayrshire, KA115DA](#)

### Introduction

This privacy notice aims to inform you about how we collect and process any information that we collect from you, or that you provide to us. It covers information that could identify you (“personal information”) and information that could not. In the context of the law and this notice, “process” means collect, store, transfer, use or otherwise act on information. It tells you about your privacy rights and how the law protects you.

We are committed to protecting your privacy and the confidentiality of your personal information. Our policy is not just an exercise in complying with the law, but a continuation of our respect for you and your personal information.

We undertake to preserve the confidentiality of all information you provide to us, and hope that you reciprocate.

Our policy complies with the Data Protection Act 2018 (Act) accordingly incorporating the EU General Data Protection Regulation (GDPR).

The law requires us to tell you about your rights and our obligations to you in regard to the processing and control of your personal data. We do this now, by requesting that you read the information provided at <http://www.knowyourprivacyrights.org>

Except as set out below, we do not share, or sell, or disclose to a third party, any information collected through our website.

### 1. Data we process

We may collect, use, store and transfer different kinds of personal data about you. We have collated these into groups as follows:

Your identity includes information such as first name, last name, title, date of birth, and other identifiers that you may have provided at some time.

Your contact information includes information such as billing address, delivery address, email address, telephone numbers and any other information you have given to us for the purpose of communication or meeting.

Technical data includes your internet protocol (IP) address, 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 this website.

Marketing data includes your preferences in receiving marketing from us, communication preferences, responses, and actions related to your use of our services.

We may aggregate anonymous data such as statistical or demographic data for any purpose. Anonymous data is data that does not identify you as an individual. Aggregated data may be derived from your personal data but is not considered personal information in law because it does not reveal your identity.

For example, we may aggregate profile data to assess interest in a product or service.

However, if we combine or connect aggregated data with your personal information so that it can identify you in any way, we treat the combined data as personal information, and it will be used in accordance with this privacy notice.

## **The basis on which we process information about you**

The law requires us to determine under which of six defined bases we process different categories of your personal information and to notify you of the basis for each category.

If a basis on which we process your personal information is no longer relevant, we shall immediately stop processing your data.

If the basis changes, then if required by law, we shall notify you of the change and of any new basis under which we have determined that we can continue to process your information.

### **2. Information we process because we have a contractual obligation with you**

When you create an account on our website, buy a product or service from us, or otherwise agree to our terms and conditions, a contract is formed between you and us.

In order to carry out our obligations under that contract, we must process the information you give us. Some of this information may be personal information.

We may use it in order to:

- verify your identity for security purposes
- sell products to you
- provide you with our services
- provide you with suggestions and advice on products, services and how to obtain the most from using our website

We process this information on the basis that there is a contract between us or that you have requested we use the information before we enter into a legal contract.

We shall continue to process this information until the contract between us ends or is terminated by either party under the contract terms.

### **3. Information we process with your consent**

Through certain actions, when otherwise there is no contractual relationship between us, such as when you browse our website or ask us to provide you more information about our business, including our products and services, you provide your consent to us to process information that may be personal information.

Wherever possible, we aim to obtain your explicit consent to process this information, for example, by asking you to agree to our use of cookies.

If you have given us explicit permission to do so, we may, from time to time pass your name and contact information to selected associates whom we consider may provide services or products you would find useful.

We continue to process your information on this basis until you withdraw your consent, or it can be

reasonably assumed that your consent no longer exists.

You may withdraw your consent at any time by instructing us [sales@oricom.co.uk](mailto:sales@oricom.co.uk). However, if you do so, you may not be able to use our website or our services further.

#### 4. **Information we process for the purposes of legitimate interests**

We may process information on the basis there is a legitimate interest, either to you or to us, of doing so.

Where we process your information on this basis, we do after having given careful consideration to:

- whether the same objective could be achieved through other means
- whether processing (or not processing) might cause you harm
- whether you would expect us to process your data, and whether you would, in the round, consider it reasonable to do so

For example, we may process your data on this basis for the purposes of:

- record-keeping for the proper and necessary administration of our business
- responding to unsolicited communication from you to which we believe you would expect a response
- protecting and asserting the legal rights of any party
- insuring against or obtaining professional advice that is required to manage organisational risk
- protecting your interests where we believe we have a duty to do so

#### 5. **Information we process because we have a legal obligation**

Sometimes, we must process your information in order to comply with a statutory obligation.

For example, we may be required to give information to legal authorities if they so request or if they have the proper authorisation, such as a search warrant or court order.

This may include your personal information.

### **Specific uses of information you provide to us**

#### 6. **Communicating with us**

When you contact us, whether by telephone, through our website or by email, we collect the data you have given to us in order to reply with the information you need.

We record your request and our reply in order to increase the efficiency of our business.

We keep personally identifiable information associated with your messages, such as your name and email address, so as to be able to track our communications with you to provide a high-quality service.

## 7. **Complaining**

When we receive a complaint, we record all the information you have given to us.

We use that information to resolve your complaint.

If your complaint reasonably requires us to contact some other person, we may decide to give to that other person some of the information contained in your complaint. We do this as infrequently as possible, but it is a matter for our sole discretion as to whether we do give information, and if we do, what that information is.

We may also compile statistics showing information obtained from this source to assess the level of service we provide, but not in a way that could identify you or any other person.

## 8. **Affiliate and business partner information**

This is information given to us by you in your capacity as an affiliate of us or as a business partner.

It allows us to recognise visitors that you have referred to us, and to credit to you commission due for such referrals. It also includes information that allows us to transfer commission to you.

The information is not used for any other purpose.

We undertake to preserve the confidentiality of the information and of the terms of our relationship.

We expect any affiliate or partner to agree to reciprocate this policy.

## **Use of information we collect through automated systems when you visit our website**

### 9. **Cookies**

Cookies are small text files that are placed on your computer's hard drive by your web browser when you visit any website. They allow information gathered on one web page to be stored until it is needed for use on another, allowing a website to provide you with a personalised experience and the website owner with statistics about how you use the website so that it can be improved.

Some cookies may last for a defined period of time, such as one day or until you close your browser. Others last indefinitely.

Your web browser should allow you to delete any you choose. It also should allow you to prevent or limit their use.

Our website uses cookies. They are placed by software that operates on our servers, and by software operated by third parties whose services we use.

When you first visit our website, we ask you whether you wish us to use cookies. If you choose not to accept them, we shall not use them for your visit except to record that you have not consented to their use for any other purpose.

If you choose not to use cookies or you prevent their use through your browser settings, you will not be able to use all the functionality of our website.

We use cookies in the following ways:

- to track how you use our website
- to record whether you have seen specific messages we display on our website

- to keep you signed in our site
- to record your answers to surveys and questionnaires on our site while you complete them
- to record the conversation thread during a live chat with our support team

We provide more information about the cookies we use in our cookie policy.

#### 10. **Personal identifiers from your browsing activity**

Requests by your web browser to our servers for web pages and other content on our website are recorded.

We record information such as your geographical location, your Internet service provider and your IP address. We also record information about the software you are using to browse our websites, such as the type of computer or device and the screen resolution.

We use this information in aggregate to assess the popularity of the web pages on our website and how we perform in providing content to you.

If combined with other information we know about you from previous visits, the data possibly could be used to identify you personally, even if you are not signed in to our website.

#### 11. **Our use of re-marketing**

Re-marketing involves placing a cookie on your computer when you browse our website in order to be able to serve to you an advert for our products or services when you visit some other website.

We may use a third party to provide us with re-marketing services from time to time. If so, then if you have consented to our use of cookies, you may see advertisements for our products and services on other websites.

### **Disclosure and sharing of your information**

#### 12. **Information we obtain from third parties**

Although we do not disclose your personal information to any third party (except as set out in this notice), we sometimes receive data that is indirectly made up from your personal information from third parties whose services we use.

No such information is personally identifiable to you.

#### 13. **Data may be processed outside the European Union**

Our websites are hosted within the European Union.

We may also use outsourced services in countries outside the European Union from time to time in other aspects of our business.

Accordingly, data obtained within the UK or any other country could be processed outside the European Union.

For example, some of the software our website uses may have been developed in the United States of America or in Australia.

We use the following safeguards with respect to data transferred outside the European Union:

- the processor is within the same corporate group as our business or organisation and abides by the same binding corporate rules regarding data processing.
- the data protection clauses in our contracts with data processors include transfer clauses written by or approved by a supervisory authority in the European Union, specifically that in the country of the United Kingdom.
- we comply with a code of conduct approved by a supervisory authority in the European Union, specifically that in the country of the United Kingdom,
- we are certified under an approved certification mechanism as provided for in the Act.
- Both our organisation and the processor are public authorities between whom there is either a legally binding agreement or administrative arrangements approved by a supervisory authority in the European Union relating to the protection of your information.

## **Control over your own information**

### **14. Your duty to inform us of changes**

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes.

### **15. Access to your personal information**

To obtain a copy of any information that we hold about you, you should contact us to make that request.

After receiving the request, we will tell you when we expect to provide you with the information and whether we require any fee for providing it to you.

### **16. Verification of your information**

When we receive any request to access, edit or delete personally identifiable information, we shall first take reasonable steps to verify your identity before granting you access or otherwise taking any action. This is important to safeguard your information.

## **Other matters**

### **17. Use of site by children**

We do not sell products or provide services for purchase by children, nor do we market to children.

If you are under 18, you may use our website only with consent from a parent or guardian

We collect data about all users of and visitors to these areas regardless of age, and we anticipate that some of those users and visitors may be children.

Such child users and visitors will inevitably visit other parts of the site and will be subject to whatever on-site marketing they find, wherever they visit.

#### 18. **Encryption of data sent between us**

We use Secure Sockets Layer (SSL) certificates to verify our identity to your browser and to encrypt any data you give us.

Whenever information is transferred between us, you can check that it is done so using SSL by looking for a closed padlock symbol or other trust mark in your browser's URL bar or toolbar.

#### 19. **How you can complain**

If you are not happy with our privacy policy or if you have any complaint, then you should tell us.

If a dispute is not settled then we hope you will agree to attempt to resolve it by engaging in good faith with us in a process of mediation or arbitration.

If you are in any way dissatisfied about how we process your personal information, you have a right to lodge a complaint with the Information Commissioner's Office (ICO). This can be done at <https://ico.org.uk/make-a-complaint/>. We would, however, appreciate the opportunity to talk to you about your concern before you approach the ICO.

#### 20. **Retention period for personal data**

Except as otherwise mentioned in this privacy notice, we keep your personal information only for as long as required by us:

- to provide you with the services you have requested;
- to comply with other law, including for the period demanded by our tax authorities;
- to support a claim or defence in court.

#### 21. **Compliance with the law**

Our privacy policy has been compiled so as to comply with the law of every country or legal jurisdiction in which we aim to do business. If you think it fails to satisfy the law of your jurisdiction, we should like to hear from you.

However, ultimately it is your choice as to whether you wish to use our website.

#### 22. **Review of this privacy policy**

We may update this privacy notice from time to time as necessary. The terms that apply to you are those posted here on our website on the day you use our website. We advise you to print a copy for your records.

If you have any questions regarding our privacy policy, please [contact us](#).

# Oricom Cookies Policy

## 1. Introduction

- 1.1 Our website uses cookies.
- 1.2 Insofar as those cookies are not strictly necessary for the provision of [our website and services], we will ask you to consent to our use of cookies when you first visit our website.

## 2. Credit

- 2.1 This document was created using a template from SEQ Legal (<https://seqlegal.com>).

## 3. About cookies

- 3.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.
- 3.2 Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

## 4. Cookies that we use

- 4.1 We use cookies for the following purposes:
  - (a) authentication - we use cookies to identify you when you visit our website and as you navigate our website (cookies used for this purpose are: *identify cookies*);
  - (b) personalisation - we use cookies [to store information about your preferences and to personalise our website for you (cookies used for this purpose are: *identify cookies*);
  - (c) analysis - we use cookies to help us to analyse the use and performance of our website and services (cookies used for this purpose are: *identify cookies*); and
  - (h) cookie consent - we use cookies to store your preferences in relation to the use of cookies more generally (cookies used for this purpose are: *identify cookies*).

## 5. Cookies used by our service providers

- 5.1 Our service providers use cookies and those cookies may be stored on your computer when you visit our website.
- 5.2 We use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google's privacy policy is available at: <https://www.google.com/policies/privacy/>. The relevant cookies are: *identify cookies*.
- 5.3 We use Zoho CRM to analyse the use of our website. This information is used in order to improve and customise your browsing experience and for analytics and metrics about our visitors both on this website and other media. You can view the privacy policy of this service provider at <https://www.zoho.com/privacy.html>. The relevant cookies are: *identify cookies*.

## 6. Managing cookies

- 6.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:
  - (a) <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);
  - (b) <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
  - (c) <http://www.opera.com/help/tutorials/security/cookies/> (Opera);
  - (d) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);

(e) <https://support.apple.com/kb/PH21411> (Safari); and

(f) <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

6.2 Blocking all cookies will have a negative impact upon the usability of many websites.

6.3 If you block cookies, you will not be able to use all of the features on our website.

## 7. **Cookie preferences**

7.1 You can manage your preferences relating to the use of cookies on our website by visiting: <https://www.oricom.co.uk>

## 8. **Our details**

8.1 This website is owned and operated by *Oricom Ltd.*

8.2 We are registered in Scotland under registration number SC341694, and our registered office is at 1 Cockburn Place, Rioverside Business Park, Irvine Ayrshire KA115DA.

8.3 Our principal place of business is as above.

8.4 You can contact us:

(a) using our website contact form;

(b) by telephone, on 0800 8495 22; or

(c) by email, using [support@oricom.co.uk](mailto:support@oricom.co.uk)