

PRIVACY NOTICE

Introduction

Ophirly Systems Ltd. (referred to as "we", "us" or "our" in this privacy notice) is the data controller responsible for the personal data collected and is committed to respecting your privacy.

This Privacy Notice explains who we are, how we collect, share and use your personal data, and how you can exercise your privacy rights.

Ophirly Systems Ltd. is located at 71-75 Shelton Street, Covent Garden, London, United Kingdom, WC2H 9JQ.

Contact Us

If you have any questions about this privacy notice or the use of your personal data feel free to contact our UK Office:

By post: 71-75 Shelton Street, Covent Garden, London, United Kingdom, WC2H 9JQ

By email: info@ophirlysystems.com

Personal Data We Collect From You

We collect personal data from you when you:

- contact us
- purchase goods from us
- register a customer account with us
- sign up for our newsletter and other marketing activities

The types of personal data we collect from you includes/are:

- **Identity Details** includes your first name and last name
- **Contact Details** include your email address, home postal address/billing address, delivery address (if different), and your contact telephone number
- **Payment Details** includes your bank details and payment card details
- **Technical Data** includes internet protocol (IP) address, browser type and version, time zone, location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website

- **Profile Data** includes feedback and survey responses

It is important that the personal data we hold about you is accurate and up to date.

Please keep us informed of any changes to your personal data during your relationship with us, such as change of contact details etc.

Personal Data Collected From Other Sources

Sometimes we work carefully with selected third parties and we may receive your personal data from them. The third parties include:

- business partners
- suppliers
- sub-contractors
- advertisers
- referrers
- social media networking sites such as LinkedIn

Lawful Basis of Processing

Data Protection laws only permit us to process personal data where we have a valid legal basis to do so.

We only process personal data where we have one of the following legal basis:

- enter into, or for the performance of a contract
- legal duty or obligation
- to protect vital interests
- for our legitimate interest (you may object to this processing at any time)
- where you consent to it

Purposes of Processing

We use your personal data for the following purposes:

- To provide you with our products and services
- To process your order and accept payments
- Communicate with you about your transactions with us and send you information or request feedback about features on our website
- To provide customer care and support
- To use data analytics, to improve our website, services, marketing and consumer experiences

- To administer and protect our business and website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)
- For internal research, development and analytics to monitor current vehicle performance and to develop new functions, products and services
- To manage our relationship with you by:
 - providing you with our newsletter
 - updating you about important changes to the website
 - inform you about new products and services
 - update your preferences on what you want to hear from us
- To provide information to you

Sharing Your Personal Data

We may share personal data when we:

- are required to by government bodies or law enforcement agencies
- engage a supplier to process personal data on our behalf (e.g. to issue invoices, logistics)

Who We Share Your Personal Data With

We may share your personal data with third parties for the purposes referred to above, these include:

- our service providers
- tax, government and any relevant regulatory authorities
- prosecuting authorities and courts, and/or other relevant third parties connected with legal proceedings or claims
- fraud prevention and/or law enforcement agencies
- third parties where we are required to do so by law

We require all organisations engaged by us to respect the security of your personal data and to treat it in accordance with the law.

Transfer of Your Personal Data Outside The UK

Your personal data may be transferred outside of the UK to trusted service providers and other third parties when necessary.

When we do this we require third parties to keep your personal data confidential and secure. We ensure that suitable protection is maintained at all times by ensuring that appropriate safeguards are in place.

Retaining Your Personal Data

We keep personal data for as long as it is required by us to meet our legal or regulatory obligations and for the exercise and/or defence of any legal claims.

Opting Out of Marketing and Preference Updates

If you no longer wish to receive direct marketing and updates from us, you can unsubscribe at any time by clicking on the link in the footer of any marketing email you receive from us or using the 'unsubscribe from all' link within the email preference centre accessible through the emails.

Profiling

We do not engage in any profiling activities with your personal data.

Automated Decision Making

We do not use any automated processes to make decisions about you which may produce legal or significant effects concerning you.

Your Data Subject Rights

You have certain rights relating to the personal data we hold about you.

However, they may be subject to various exceptions and limitations.

These rights can be exercised by using the contact information in this privacy notice.

Your rights:

Right to be informed: We are obliged to provide clear and transparent information about our processing activities of your personal data.

Request access to your personal data (commonly known as a "data subject access request"): You have the right to understand what personal data we hold about you and why.

Request correction of the personal data: If you believe that we hold inaccurate or incomplete personal data, you have the right to request us to rectify or correct your personal data.

Request erasure of your personal data: You may ask us to delete or remove personal data where there is no good reason for us continuing to process it. Please note, however, that we may not always be able to comply with your request of erasure for specific legal reasons

Request restriction of processing of your personal data: You may ask us to stop processing your personal data. We will still hold the data but will not process it any further. You may exercise the right to restrict processing when one of the following conditions applies:

- the accuracy of the personal data is contested
- processing of the personal data is unlawful
- we no longer need the personal data for processing but the personal data is required for part of a legal process
- the right to object has been exercised and processing is restricted pending a decision on the status of the processing

Right to Data Portability: You may request your personal data be transferred to another controller or processor, provided in a commonly used and machine-readable format. This right is only available if the original processing was on the basis of consent, the processing is by automated means and if the processing is based on the fulfilment of a contractual obligation.

Right to Withdraw Consent: You may withdraw consent at any time if we are relying on your consent to process your personal data. This won't affect any processing already carried out before you withdraw your consent or processing under other grounds.

We may need specific information from you to help us confirm your identity.

Making a Data Protection Complaint

If you have any concerns about the use of your personal data, or the way we handle your requests relating to your rights, you can raise a complaint directly with us by using the contact details provided in this notice.

If you are not satisfied with the way we handle your complaint, you are entitled to raise a complaint directly with the Information Commissioner's Office (ICO).