

## **Privacy Notice**

**Last Updated:** 23<sup>rd</sup> April 2018

This Privacy Policy applies to information that Charter 4 Solutions Ltd, and any parents, subsidiaries and affiliate entities worldwide (individually and collectively referred to herein as the “Charter 4 Solutions”, “we,” “us” or “our”) collects about you on or via charter 4.com or charter4oil.com (or any subdomain), or one of our other websites, applications or other services from which you are accessing this Privacy Policy (each referred to herein as a “Site,” and collectively, the “Sites”). This Privacy Policy describes how we collect such information, how we use it and to whom and under what circumstances we may disclose it.

### HOW WE COLLECT INFORMATION

#### *Information You Provide to Us*

We (or our service providers) may collect information from you when you:

- purchase service or products from us,
- create an account with us, or otherwise sign up for a service or feature;
- participate in a survey, poll, sweepstakes, contest or other promotion;
- communicate with us via third-party social media sites;
- submit a rating or review;
- or contact us, or otherwise communicate with us or provide information to us.

The “personal information” we collect may include, for example, your name, postal address, postal code, email address, telephone number, date of birth, payment information, details on items purchased, and other information you choose to provide to us. In some cases, you may provide information to us about someone else, such as when you request that we deliver an e-commerce order to that person or when you share website content. In these type of cases, you agree that you have the authority to provide us with such information.

#### *Automatically Collected Site Usage Data*

To facilitate the operation of a website, certain information is collected automatically from or about you in connection with your visit to the website or the device you are using to access the website. Servers may automatically gather site usage information (for example your IP address, information about your web browser, your device, your location (subject to consent), shopping, browsing and other such activities).

## COOKIES AND SIMILAR TECHNOLOGIES

Like many companies, we (and our service providers) use cookies and other similar technologies to collect, store and track information about your Site usage. This information helps us to provide, operate, improve and personalise our Sites.

### *What are Cookies*

Cookies are small files of letters and numbers. These files are stored on the hard drive of the device you are using, be it a PC, mobile phone, or tablet. These letters and numbers are used to allow a website to remember certain bits of information, so that the user experience can be improved next time you visit.

By using our website you agree that we may store and access cookies on your device in accordance with this Privacy Policy.

### *How we use Cookies*

When you visit our website it is likely we will create cookies which are stored on your device. For the duration of your 'session' on our website these cookies help us to deliver the correct information and ensure you only have to enter required information once, thereby improving your browsing experience.

We also use web analytics to understand how many people have visited our website, what they have looked at and how they found us etc. This gives us a better understanding of how our website is working. All data accrued cannot be used to identify personal information and merely gives us a general idea of how our website performs.

This overview of the type of cookies we use is based on categories outlined by the International Chamber of Commerce, in the ICC UK Cookie Guide. Some cookies may appear in multiple categories.

#### **Category 1: strictly necessary cookies**

These cookies are necessary for the website to function. By disabling these cookies, some aspects of a website will either not work, or not work properly, such as secure logins, location services, and e-commerce functionality.

#### **Category 2: performance cookies**

These cookies gather information to help improve the day to day performance of a website. By analysing data collected we can enhance popular pages, fix bugs and error messages etc. All data is based on totals and averages and is strictly anonymous. For example we use Google Analytics, which creates several first-party cookies. The data that Google collects is kept strictly private and confidential and won't be shared with anyone else. We don't feel

that Google Analytics is a breach of privacy as we are merely aggregating the data survey. The information that is collected is used to understand website trends and performance.

**Category 3: functionality cookies**

These are cookies which provide a 'memory' for the website, this enables the website to remember any personal choices you make (for example, your username, language or geographic location). A website may provide local weather reports, traffic updates and other similar localised information. These cookies are also used to remember changes you may make to text sizes, fonts and other customisable elements of the website. The information these cookies collect may be made anonymous and can't track activity on other websites.

**Category 4: targeting cookies or advertising cookies**

We nurture the use of social media websites and believe sharing is a key part of how people access new information. Social media networks are a popular way of doing this. To enable people to share information via popular social media, our website may have functionality allowing this type of activity.

The owners of social media websites may place cookies on users' devices and they will have their own cookie policies. We have no control over these companies' cookies policies.

*How to turn off cookies*

Most web browsers enable you to decline or block cookies (check the "Help" or "Settings" menus of your browser to learn more). It is your right to decline cookies however doing so may disable certain features within our website(s) and compromise your experience.

**HOW YOUR INFORMATION IS USED**

The information we collect may be used in a number of ways, including:

- improving your browsing and functional experience;
- to fulfil orders and requests submitted by you;
- to contact you (via post, email, and any other method you may have chosen) with relevant information to promote our products or services or educate our users on applicable changes therein;
- to contact you if appropriate in regards to a rating or review submitted;
- where appropriate, for market research;
- to better understand you in order to provide relevant, more tailored communications on our products and services;
- protecting the security, legality or integrity of our business;
- And otherwise, with your permission or as permitted by law.

Any information you provide about another person will be used to fulfil your requests and treat such information in accordance with this Privacy Policy. Please refrain from providing other persons information if you do not have consent to provide and use their data for this purpose. We analyse and use information collected by our website automatically, and through cookies, beacons and other technologies, potentially in combination with personal information, to assess the activities of our users and measure the effectiveness of our website and digital marketing materials. We do this on both an individual basis and as aggregated results.

With your consent to this Policy, we may combine the information we collect online from or about you with the information we collect offline from or about you. We will not store your personal data for any purpose for longer than is necessary to fulfil our service to you or as required by law.

## WHO WE SHARE INFORMATION WITH

We may disclose information as follows, to the extent permitted by law:

- to our suppliers and service partners who process information on our behalf (such as website hosting companies, analytics companies such as Google, distribution and fulfilment and other similar partners who facilitate the functionality and services required to deliver our services. For further information on the third-party companies currently acting as data processors please contact [info@charter4.com](mailto:info@charter4.com);
- as required by law, or to provide information as required by local law enforcement agencies, other local government authorities, or otherwise as required by law;
- when you post to a social media website, forum, review website or any other such facility in the public domain any information you choose to post will be available to access on the internet, depending on your own personal account settings. We recommend that you do not make public and sensitive personal information such as your postal address, with your permission or as permitted by law;
- content and information that you submit on or through Facebook, Twitter, Pinterest, Instagram, Tumblr and other third-party platforms may appear on our website(s) via automated feeds, APIs and plug-ins. Please review the privacy policy of any such third party platform, for whom we have no responsibility.

## THIRD-PARTY WEBSITES

The Sites may contain links (which may take the form of hyperlinks, widgets, clickable logos, plug-ins, images or banners) to websites and services operated by entities other than us. This Privacy Policy does not apply to such other websites or services, so we recommend that you review and understand the individual privacy policy of any such third-party website.

## YOUR PRIVACY OPTIONS

### *UNSUBSCRIBING FROM PROMOTIONAL CONTENT*

If you would like to stop receiving promotional emails or other direct mail from us, please follow the unsubscribe instructions located in each such email or contact us as below. Should you choose to opt out we reserve the right to contact you in relation to your account, transactions or other essential communications as required by email or post.

### *ACCESS TO YOUR PERSONAL INFORMATION*

Should you wish to access any personal information we hold about you may instruct us to provide you with any such information at any time. We reserve the right to request suitable evidence of your identity.

### *ERASURE OF PERSONAL INFORMATION*

With the exception of general exclusions, where processing is necessary, such as exercising the right of freedom of expression and for compliance with legal obligations or claims, you have the right to request that all personal data be permanently removed from our databases without undue delay.

To access or delete your personal data, please contact us at [info@charter4.com](mailto:info@charter4.com). Please include the details of your request, your name, email and postal address and any other information required to process your requirement.

## SECURITY

Technical and organisational security measures have been put in place to ensure any personal data in our control is suitably safeguarded. We have limited access to direct employees and authorised service providers who require such information to deliver our services and for the purposes outlined in this policy.

While we have endeavoured to protect our systems, it is impossible to guarantee that any information, during transmission or while stored on our systems, will be absolutely safe from intrusion by others, such as hackers.

## CHILDREN'S PRIVACY

The Site is not directed to children under the age of thirteen (13). If you are under thirteen, do not provide your personal information on or to the Site. Users who are below the age of eighteen (18) should not use the Site without permission from their parent or legal guardian.

#### PHISHING / SPOOFING SCHEMES

If you receive a request to provide sensitive information (including your Account password, or any payment information) via email or to a website or individual claiming to be us, that does not appear legitimate, please do not respond or disclose your information. Please immediately report any such communication or request to us at: [info@charter4.com](mailto:info@charter4.com)

#### CHANGES TO THIS PRIVACY POLICY

We reserve the right to and may change this Privacy Policy on occasion where required. In some circumstances we may instruct users of updates to our policy via a notification. Our latest Privacy Policy will be available on our website(s) and should be reviewed for the avoidance of doubt.

#### CONTACT US

If you require additional information about our Data Protection Officer, the specific roles of any data controllers or processors and/or you have any questions about this Privacy Policy, please email us at [info@charter4.com](mailto:info@charter4.com), or in writing to:

The Data Protection Officer  
Charter 4 Solutions Ltd.  
14 Stanley Road  
Newbury  
Berkshire  
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