

## WEBSITE PRIVACY NOTICE

### 1 INTRODUCTION

- 1.1 This Privacy Notice provides information about how Ash Technologies Limited with registered company number 220749 (“we”, “our”, “us”) collects and processes the personal data of individuals (“you”, “your”) who visit and/or interact with our website [www.ashvision.com](http://www.ashvision.com) (the “Website”) and to all subsequent correspondence or communications with those people, whether by email, telephone, in person or otherwise.
- 1.2 For information on how we process your personal data if you purchase our products and/or services, see our Customer Privacy Notice at [www.ashvision.com/customer-privacy-notice/](http://www.ashvision.com/customer-privacy-notice/).
- 1.3 We are a “controller” of your personal data. This means that we are responsible for deciding the purposes and means by which we use the personal data we hold about you. “Personal data” is any information by which you or any living person can be individually identified either directly or indirectly but does not include anonymised data. There are “special categories” of more sensitive personal data which require a higher level of protection.
- 1.4 As a controller, we are obliged to provide this Privacy Notice to you under Irish data protection laws, including the General Data Protection Regulation (EU) 2016/679 (“GDPR”), and the Data Protection Acts 1988 to 2018, as such laws may be updated from time to time (“Data Protection Laws”). In brief this Privacy Notice explains:
- what personal data of yours we hold and why we process it;
  - the legal grounds that allow us to process your personal data;
  - where we obtain your personal data, who gets to see it and how long we keep it;
  - your data protection rights; and
  - where to address queries or complaints.
- 1.5 This Privacy Notice does not form part of any contract, or offer to enter into a contract, with us. It may be amended by us at any time. We reserve the right to amend this Privacy Notice at any time, for any reason, without notice to you, other than the posting of the amended Privacy Notice on the Website. We recommend that you check the Website often, referring to the date of the last modification listed at the top.
- 1.6 It is important that you read this Privacy Notice so that you are aware of how and why we are using your personal data. Please see Section 12 (Your Data Protection Rights) and Section 14 (Queries and Complaints) for further information about your rights and how to exercise those rights.
- 1.7 If you fail to provide certain information when requested, we may not be able to perform a contract we have entered into with you, or we may be prevented from complying with our legal obligations.

### 2 WHAT PERSONAL DATA WE COLLECT ABOUT YOU

- 2.1 We may collect, use, store and transfer different categories of personal data about you which we have grouped together as follows:
- **Identity Data** including your first name and surname.
  - **Contact Data** including your email address, phone number and postal address.
  - **Marketing Data** including your preferences in receiving marketing communications from us.

- **Communications Data** including your interactions with us and any queries, complaints or feedback.
- **Technical Data** including internet protocol (IP) address, your login data, 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.
- **Usage Data** including information about how you use the Website and our services.
- **CCTV Data:** namely your image and time or recording as capture by closed-circuit television in operation at our offices.

We do not collect any *special categories of personal data* about you (this is personal data that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership; genetic data; biometric data for the purpose of uniquely identifying an individual or data concerning health or sexual orientation).

Where we need to collect personal data by law, or under a contract with you, and you do not provide that personal data when requested, you may not be able use certain features of the Website. We will let you know at the time of collecting personal data from you whether you must provide the personal data to use any of our Website features or services, and whether the provision of personal data requested by us is optional.

### 3 HOW WE COLLECT YOUR PERSONAL DATA

We may receive your personal data through various means including:

- **Direct interactions:** We obtain your Identity Data, Contact Data and Communications Data when you interact with us through the Website (including when the Website is accessed from mobile devices and by phone) or otherwise. This includes personal data you provide when you contact us and when you give us feedback. We collect your Marketing Data when you indicate to us your preferences for receiving marketing communications from us.
- **Automated technologies:** As you browse and interact with the Website, we collect Technical Data and Usage Data. We collect this personal data by using cookies and other similar technologies. Please see our Cookies Policy at [www.ashvision.com/cookie-policy/](http://www.ashvision.com/cookie-policy/) for further details.

### 4 THE LEGAL BASES WE RELY ON TO PROCESS YOUR PERSONAL DATA

4.1 Data Protection Laws permit six legal bases to process personal data. The legal bases that we rely on are set out in table in this section of the Privacy Notice. In some contexts, more than one legal basis may apply to the processing activities we or our processors carry out.

Legal basis	Explanation
Processing is necessary to comply with our legal obligations (“ <b>Legal Obligation</b> ”)	Ensuring we perform our legal and regulatory obligations.
Processing is necessary for our or a third party’s legitimate interests (“ <b>Legitimate Interests</b> ”)	We (and third parties) have legitimate interests in carrying on, managing, and administering our respective businesses. Part of managing businesses will involve the processing of your personal data. Your data will not be processed if, in processing your data, your interests, rights and freedoms related to the data override the

	businesses' interests in processing the data for businesses purposes. Where we rely on Legitimate Interests to process your personal data we will set these out more particularly in the table at Section 5 of this Privacy Notice.
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## 5 WHY WE PROCESS YOUR PERSONAL DATA

5.1 Subject to applicable law, your personal data may be stored and processed by us for purposes detailed in the following table:

<i>Purpose for processing your personal data</i>	<i>Categories of personal data</i>	<i>The legal basis we rely on</i>
To manage our relationship with you including: (i) responding to communications you submit to us by email, telephone, professional and social media, in person and other means; (ii) arranging, preparing for and attending meetings (in person and remotely); (iii) notifying you of changes to our Website and other services; (iii) notifying you of changes to this Privacy Notice and any other notices or policies published on our Website; (iv) managing complaints and disputes; (v) administering your data protection, privacy and other rights; (vi) conducting or exploring any re-organisation of some or all of our business and assets, merger or acquisition.	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Marketing Data</li> <li>• Communications Data</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate Interests (for responding to communications, attracting new clients, running and/or re-organising our business, to develop new business, keeping our records updated and to establish, exercise or defend legal rights)</li> <li>• Legal Obligation</li> </ul>
To administer and protect our business, products, services, networks, systems, the Website and data and property hosted on or made available through the Website including implementing and monitoring security measures, troubleshooting, data and usage analysis, testing, system maintenance, support, reporting and hosting of data. To anonymise personal data for statistical purposes.	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Technical Data</li> <li>• Usage Data</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate Interests (for running our business, network security, to identify and/or prevent fraud or any other unlawful activity)</li> <li>• Legal Obligation</li> </ul>
To use data analytics and similar technologies to monitor usage of the Website, to measure the performance of the Website and to optimise the Website, to improve our services, marketing strategy and output, user interactions, relationships and experiences. Please see our Cookies Policy <a href="http://www.ashvision.com/cookie-policy/">www.ashvision.com/cookie-policy/</a> for further details.	<ul style="list-style-type: none"> <li>• Technical Data</li> <li>• Usage Data</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate Interests (to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</li> </ul>

<p>To make suggestions and recommendations to you about products that may be of interest to you, to deliver relevant content and ads to you on our Website and third party websites and apps and to measure and understand the effectiveness of this. We may also observe the readership of our newsletters and other publications. Please see our Cookies Policy at <a href="http://www.ashvision.com/cookie-policy/">www.ashvision.com/cookie-policy/</a> for further details.</p>	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Technical Data</li> <li>• Usage Data</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate Interests (to grow our business, to inform our marketing and advertising strategy and output and to conduct marketing and advertising)</li> </ul>
<p>CCTV for the prevention of theft and for security of our premises.</p> <p>Further information about how we process and use CCTV please refer to our CCTV Policy</p>	<ul style="list-style-type: none"> <li>• CCTV Data</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate Interests (for running our business and to protect our property, assets, staff, and others)</li> </ul>

5.2 **Marketing:** We would like to send you information about our products, services, insights and offers, which may be of interest to you. Where we have your consent, we may do this by email. We will only ask whether you would like us to send you marketing messages when you subscribe to our mailing list on our Website. You can unsubscribe at any time by using the 'unsubscribe' link in our marketing communications. If you tell us you do not want to receive marketing messages it might take a few days for all our systems to be updated to reflect this. Please note that opting out of marketing messages will not stop service communications.

If you agree as part of our cookies framework, we will use certain technologies that allow us to see whether electronic newsletters you subscribed to through our Website have been viewed and read by you. As explained in the table above, we use this information for our legitimate interests to develop our products and services, direct market and grow our business.

5.3 **Advertising:** If you agree, we may use cookies and similar technologies that allow us to include ads for our products on other websites and apps, such as social media. The ads you see are based on information we hold about you or your previous use of our Website (e.g. your search history and the content you read on our Website) or on our adverts you have previously clicked on. For more information on our use of advertising technologies and cookies, please see our Cookies Policy at [www.ashvision.com/cookie-policy/](http://www.ashvision.com/cookie-policy/).

5.4 We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. This will only be done in accordance with our policies. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 6 THIRD PARTY INFORMATION

### 6.1 *Other individuals' personal data*

- Where you provide us with personal data relating to other people, you represent and warrant that you will only do so in accordance with applicable law, including Data Protection Laws. You will ensure that before doing so, the individuals in question are made aware of the fact that we will hold information relating to them and that we may use it for any of the purposes set out in this Privacy Notice and where necessary you will obtain their consent to our use of their information. You will provide anyone that you

provide us with personal data about with a copy of this Privacy Notice. We may notify those individuals that you have provided their details to us.

## **6.2 Information collected through third-party links and content**

- This Website may include links to other websites and other content from third party businesses and can offer direct interaction with external websites, networks or platforms that are outside our control. These third-party businesses may use cookies, web beacons or other similar technology to collect information about you. We do not have access to or control over these third parties or the cookies, web beacons or other technology that these third parties may use. We are not responsible for the security, privacy of the information collected by these third parties or the privacy practices of these third parties or the content on any third-party website. You are encouraged to review the privacy policies of the different websites you visit.

## **7 DISCLOSURE OF YOUR PERSONAL DATA**

7.1 We reserve the right to disclose your personal data to third parties:

- if we are under any legal or regulatory duty to do so;
- to protect our rights or the safety of us, our personnel, users or others; and
- in the context of the possible sale or restructuring of our business.

7.2 We also use third party service providers as our processors to only hold and use personal data on our behalf in order to provide us with a service. We may also disclose personal data to our professional advisors and experts in order to obtain their assistance in carrying out our services and our activities. For example, the following activities are carried out by professional advisors and third-party service providers, which may involve their processing of your personal data in respect of the service they provide: customer data for email communications, customer data base management and cloud services for the products. We require these parties to keep your personal data confidential and secure and to protect it in accordance with the law. They are only permitted to process your personal data for the lawful purpose for which it has been shared and in accordance with our instructions.

## **8 TRANSFERS OF YOUR PERSONAL DATA**

In connection with our business and for administrative, management and legal purposes, we may transfer your personal data to jurisdictions outside of the European Economic Area. Where we need to transfer your personal data, we shall ensure that the transfer is lawful and that there are appropriate security arrangements.

## **9 SECURITY OF YOUR PERSONAL DATA**

9.1 We are committed to maintaining the security of your personal data. We maintain appropriate physical, procedural, organisational and technical security measures intended to prevent loss, misuse, unauthorised access, disclosure, or modification of your personal data under our control. We also limit access to your personal data within our organisation and to third parties that need access to your information in provision of service to us. They will only process your personal data on our instructions and are required to protect personal data. If you have reason to believe that your personal data is no longer secure, please notify us immediately using the contact information supplied in Section 14 (Queries And Complaints).

9.2 Please be aware that when you transmit information to us or to our service providers over the internet or another telecommunications network this can never be guaranteed to be 100% secure. We cannot guarantee against any loss, misuse, unauthorised disclosure, alteration or destruction of data but we take reasonable steps to prevent this from happening. We have put in place measures to protect the security of your personal data and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 10 RETENTION OF YOUR PERSONAL DATA

We endeavour to ensure that personal data is kept as current as possible and that irrelevant or excessive data is deleted or made anonymous as soon as reasonably practicable. We generally retain personal data for as long as is required to satisfy the purpose for which it was collected. We are required to keep certain types of information for a specific period of time in order to comply with legal requirements. Some of your personal data may need to be retained because of circumstances such as a legal dispute or regulatory investigation, which would not normally be subject to retention.

## 11 AUTOMATED DECISION-MAKING

11.1 Automated decision-making takes place when an electronic system uses personal data to make a decision without human intervention.

11.2 You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you. We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

## 12 YOUR DATA PROTECTION RIGHTS

You have various rights under Data Protection Laws, subject to certain exemptions, in connection with our processing of your personal data, including those set out in the table below.

Right	Explanation
<b><i>Access and Information</i></b>	You are entitled to receive, on request and free of charge, a copy of all your personal data that we hold together with other information about the processing of that personal data. There are some limitations to this right. For example, if the personal data also relates to another person and we do not have that person's consent, or if the personal data is subject to legal privilege. Where there is data that we cannot disclose, we will explain this to you.
<b><i>Rectification of your personal data</i></b>	You may request to have inaccurate or incomplete information corrected and updated by us.
<b><i>Erasure of your personal data</i></b>	This right enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing. However, where we hold and process your personal data in order to comply with legal obligations, such as compliance with tax, or for the establishment exercise or defence of legal claims, your right to ask us to delete or remove your personal data is limited.
<b><i>Object to processing</i></b>	You may object to our processing of your personal data where we are relying on a legitimate interest (or those of a third party) in order to justify the basis for our processing your personal data and there is something about your

	particular situation which makes you wish to object to processing on this ground.
<b><i>Request restriction of processing of your personal data</i></b>	This right enables you to ask us to suspend the processing of your personal data (e.g. if you want us to establish its accuracy or the reason for processing it).
<b><i>Data Portability</i></b>	Where we process your personal data by automated means (i.e. not on paper) and this processing is based on your consent or required for the performance of a contract between us, you are entitled, where technically feasible to request that we transmit your personal data in this format to another controller.
<b><i>The right to complain to the Data Protection Commission</i></b>	You have the right to make a complaint in respect of our compliance with Data Protection Laws to the Data Protection Commission, the supervisory authority in Ireland.

### 13 UPDATING YOUR PERSONAL DATA

You are responsible for notifying us of any changes to your personal data that you provide to us.

### 14 QUERIES AND COMPLAINTS

If you have any questions or wish to exercise any of your data protection rights, you should raise these with our data protection team by emailing [dataprotection@ashvision.com](mailto:dataprotection@ashvision.com). You may also raise complaints with the Data Protection Commission. For contact and other details see: [www.dataprotection.ie](http://www.dataprotection.ie).