



# PRIVACY POLICY

Last updated: 25 May 2018

Synapse Electroceutical Ltd (registered number 04626631), whose registered office is at 1 Churchill Court, Hortons Way, Westerham, Kent, TN16 1BT, knows that you care how information about you is used and shared and we appreciate your trust in us to do that carefully and sensibly. This notice describes our privacy policy and forms part of our website terms and conditions ('Website Terms').

**By accepting our Website Terms or by visiting [www.synapseelectroceutical.com](http://www.synapseelectroceutical.com) ('the Website') you are accepting and consenting to the practices described in this Privacy Policy.**

The Website is brought to you by Synapse Electroceutical Ltd. Synapse Electroceutical Ltd believes it is important to protect your Personal Data (as defined in the Data Protection Act 1998) and we are committed to giving you a personalised service that meets your needs in a way that also protects your privacy. This policy explains how we may collect Personal Data about you. It also explains some of the security measures we take to protect your Personal Data, and tells you certain things we will do and not do. You should read this policy in conjunction with the Website Terms.

When we first obtain Personal Data from you, or when you take a new service or product from us, we will give you the opportunity to tell us if you do or do not want to receive information from us about other services or products (as applicable). You can normally do this by ticking a box on an application form or contract. You may change your mind at any time by emailing us at the address below.

Some of the Personal Data we hold about you may be 'sensitive personal data' within the meaning of the Data Protection Act 1998, for example, information about your health or ethnic origin.

## 1. Collecting Information

We may collect Personal Data about you from a number of sources, including the following:

- 1.1. From you when you agree to take a service or product from us, in which case this may include your contact details, date of birth, how you will pay for the product or service and your bank details.
- 1.2. From you when you contact us with an enquiry or in response to a communication from us, in which case, this may tell us something about how you use our services.

- 1.3. From documents that are available to the public, such as the electoral register.
- 1.4. From third parties to whom you have provided information with your consent to pass it on to other organisations or persons.

## 2. Using Your Personal Information

- 2.1. Personal Data about our customers is an important part of our business and we shall only use your Personal Data for the following purposes and shall not keep such Personal Data longer than is necessary to fulfil these purposes:
  - 2.1.1. To help us to identify you when you contact us.
  - 2.1.2. To help us to identify accounts, services and/or products which you could have from us or selected partners from time to time. We may do this by automatic means using a scoring system, which uses the Personal Data you have provided and/or any information we hold about you and Personal Data from third party agencies (including credit reference agencies).
  - 2.1.3. To help us to administer and to contact you about improved administration of any accounts, services and products we have provided before, do provide now or will or may provide in the future.
  - 2.1.4. To help to prevent and detect fraud or loss.
  - 2.1.5. To allow us to contact you in any way (including mail, email, telephone, visit, text or multimedia messages) about products and services offered by us where:
    - 2.1.5.1. these products are similar to those you have already purchased from us,
    - 2.1.5.2. you were given the opportunity to opt out of being contacted by us at the time your Personal Information was originally collected by us and at the time of our subsequent communications with you, and
    - 2.1.5.3. you have not opted out of us contacting you.
  - 2.1.6. To allow us to contact you in any way (including mail, email, telephone, visit or text message) about products and services offered by us and selected partners where you have expressly consented to us doing so.
  - 2.1.7. We may monitor and record communications with you (including phone conversations and emails) for quality assurance and compliance.
  - 2.1.8. We may check your details with fraud prevention agencies. If you provide false or inaccurate information and we suspect fraud, we will record this.
- 2.2. We will not disclose your Personal Data to any third party except in accordance with this Privacy Policy.

- 2.3. We may allow other people and organisations to use Personal Data we hold about you in the following circumstances:
- 2.3.1. If we, or substantially all of our assets, are acquired or are in the process of being acquired by a third party, in which case Personal Data held by us, about our customers, will be one of the transferred assets.
  - 2.3.2. If we have been legitimately asked to provide information for legal or regulatory purposes or as part of legal proceedings or prospective legal proceedings.
  - 2.3.3. We employ companies and individuals to perform functions on our behalf and we may disclose your Personal Data to these parties for the purposes set out in clause 2.1 or, for example, for fulfilling orders, delivering packages, sending postal mail and email, removing repetitive information from customer lists, analysing data, providing marketing assistance, providing search results and links (including paid listings and links) and providing customer service. Those parties are bound by strict contractual provisions with us and only have access to Personal Data needed to perform their functions, and may not use it for other purposes. Further, they must process the Personal Data in accordance with this Privacy Policy and as permitted by the Data Protection Act 1998. From time to time, these other people and organisations to whom we may pass your Personal Data may be outside the European Economic Area. We will take all steps reasonably necessary to ensure that your Personal Data is treated securely and in accordance with this Privacy Policy and the Data Protection Act 1998.
- 2.4. Where you give us Personal Data on behalf of someone else, you confirm that you have provided them with the information set out in this Privacy Policy and that they have not objected to such use of their Personal Data.
- 2.5. In connection with any transaction which we enter into with you:
- 2.5.1. We may carry out with one or more licensed credit reference and fraud prevention agencies:
    - 2.5.1.1. credit checks where you have given us your express consent, and
    - 2.5.1.2. fraud prevention checks.
- We and they may keep a record of the search. Information held about you by these agencies may be linked to records relating to other people living at the same address with whom you are financially linked. These records will also be taken into account in credit and fraud prevention checks. Information from your application and payment details of your account will be recorded with one or more of these agencies and may be shared with other organisations to help make credit and insurance decisions about you and members of your household with whom you are financially linked and for debt collection and fraud prevention. This includes those who have moved house and who have

missed payments.

- 2.5.2. If you provide false or inaccurate information to us and we suspect fraud, we will record this and may share it with other people and organisations. We, and other credit and insurance organisations, may also use technology to detect and prevent fraud.
- 2.5.3. If you need details of those credit agencies and fraud prevention agencies from which we obtain and with which we record information about you, please write to our Data Protection Manager at Synapse Electroceutical Ltd, 1 Churchill Court, Hortons Way, Westerham, Kent, TN16 1BT.

## 3. Protecting Information

We have strict security measures to protect Personal Data.

- 3.1. We maintain physical, electronic and procedural safeguards in connection with the collection, storage and disclosure of personally identifiable customer information. Our security procedures mean that we may occasionally request proof of identity before we disclose personal information to you.
- 3.2. It is important for you to protect against unauthorised access to your password and to your computer. Be sure to sign off when you finish using a shared computer.

## 4. The Internet

- 4.1. If you communicate with us using the internet, we may occasionally email you about our services and products. When you first give us Personal Data through the Website, we will normally give you the opportunity to say whether you would prefer us not to contact you by email. You can also always send us an email (at the address set out below) at any time if you change your mind.
- 4.2. Please remember that communications over the internet, such as emails and webmails (messages sent through a website), are not secure unless they have been encrypted. Your communications may go through a number of countries before they are delivered - this is the nature of the internet. We cannot accept responsibility for any unauthorised access or loss of Personal Data that is beyond our control.

## 5. Managing Cookies

Cookies help us identify your device, performance of typical actions on this website or when you are logged in to specific secure zones. We use strictly necessary and functional cookies to enable you to move around the site and to provide basic features. Tracking and performance cookies are used to provide a better overall user experience. Below are the type of cookies present on our website:

## 1. Strictly necessary cookies

Some cookies are strictly necessary in enabling you to move around this website and use its most basic features. Without these cookies, for example, you would not be able to login to secure zones or keep track of your online shopping cart.

These cookies can't be disabled.

## 2. Tracking and other optional cookies

We use performance and tracking cookies internally to enable us to provide you with a better user experience. Information supplied by these cookies helps us understand how our visitors behave on this website, track unique visitors or time spent on the site, and on different web pages so that we can improve how we present content to you.

The Cookies on this website consist of:

- Google Analytics cookies for monitoring

The following are Cookies set by another website:

Name	Purpose	Type
_utmz	Monitors movement through the website	Session Cookie set by a 3rd party - Google Analytics
_utmb	Monitors movement through the website	Persistent Cookie set by a 3rd party - Google Analytics
_utmz	Stores how you arrived at the website (which keyword, link or search engine)	Persistent Cookie set by a 3rd party - Google Analytics
_utma	Stores how many visits and first visit plus previous visit information	Persistent Cookie set by a 3rd party - Google Analytics

By using this website, you agree that we can place these types of cookies on your device.

If you have any queries about these, or would like more information, please contact our Data Protection Manager at Synapse Electroceutical Ltd, 1 Churchill Court, Hortons Way, Westerham, Kent, TN16 1BT, or email us at [info@synapseelectroceutical.com](mailto:info@synapseelectroceutical.com).

## 6. Further Information

- 6.1. If you would like any more information or you have any comments about our Privacy Statement, please either write to us at Data Protection Manager, Synapse Electroceutical Ltd, 1 Churchill Court, Hortons Way, Westerham, Kent, TN16 1BT, or email us at [info@synapseelectroceutical.com](mailto:info@synapseelectroceutical.com).
- 6.2. We may amend this Privacy Statement from time to time without notice to you, in which case, we will publish the amended version on the Website. You confirm that we shall not be liable to you or any third party for any change to this Privacy Statement from time to time. It is your responsibility to check regularly to determine whether this Privacy Statement has changed.
- 6.3. You can ask us for a copy of this Privacy Statement by emailing us at [info@synapseelectroceutical.com](mailto:info@synapseelectroceutical.com). This Privacy Statement applies to Personal Data we hold about individuals. It does not apply to information we hold about

companies and other organisations.

- 6.4. If you would like access to the Personal Data that we hold about you, you can do this by emailing us at [info@synapseelectroceutical.com](mailto:info@synapseelectroceutical.com). There may be a nominal charge to cover administrative costs.
- 6.5. We aim to keep the Personal Data we hold about you accurate and up to date. If you tell us that we are holding any inaccurate Personal Data about you, we will delete it or correct it promptly. Please email us at [info@synapseelectroceutical.com](mailto:info@synapseelectroceutical.com) to update your Personal Data.