



PRIVACY POLICY

SPEAR-UK Limited is committed to protecting your privacy.

This statement (together with our General Terms and Conditions) sets out the basis on which any personal data we collect from and about you, or that you provide to us, will be processed by us.

Please read this Privacy Statement carefully to understand our views and practices regarding your personal data and how we will treat it.

1. Your Personal Data – We will collect and process the following data about you:

Information you give us:

This is any information about you that you voluntarily give us by corresponding with us by phone, e-mail, text, through our website (www.spear.uk.com) or otherwise. The information you give us may include, but is not limited to, your name, address, e-mail address, and phone number.

Information we collect about you:

Depending on the circumstances, we might also obtain personal data about you from other sources as permitted by law. This data could include, your name, contact details (physical address) or geographic location, and publicly available information (such as, user-generated content, blogs, postings, social media user name or ID, and social media profile photo).

You should note that where you share any of your activity on third-party social media platforms, you will then be subject to the privacy and cookie policies governing the respective platforms.

We may also use aggregate information and statistics for the purposes of monitoring website usage in order to help us develop our website and our services and may provide such aggregate information to third parties. These statistics will not include information that can be used to identify any individual.

2. Processing your Personal Data

We may process your personal data for the following purposes:

- To provide you with information and updates in relation to our business, products, and events
- To permit you to participate in our social media activities and forums
- To improve our products and services
- To carry out our obligations arising from any contracts entered into between you and us
- To help us to continue to improve our website
- To complete surveys that we use for research purposes (although such surveys will not be compulsory)
- To respond to your questions and comments
- For internal record keeping purposes.

Please note that, when you use our website, we automatically collect and store certain information about your computer or device and your activities, including:

- Your IP address
- Details of your visits to our website including, but not limited to, traffic data, location data and other communication data and the resources, advertisements and linked sites that you access.

We do not hold more information than is necessary for the purpose for which we collect it. We do not collect or keep your personal information for any longer than is necessary for the purposes for which it was collected or as required by law.





3. Sharing your Personal Data

We may disclose your personal data to other third parties for the reasons described below. In some cases, this may involve transferring your personal data to other countries (inside and outside the European Economic Area (EEA)).

- To support our business operations
- For audit purposes
- To comply with any legal obligation
- To apply or enforce our General Terms and Conditions.

To the extent that we do share your personal data with a third party, we would only do so if that party has agreed to comply with the terms of this Privacy Statement.

By providing any personal data to us, you fully understand and clearly consent to such use and transfers as set out in this Privacy Statement

4. Keeping your Personal Data Secure

We take our data security responsibilities seriously, employing the most appropriate physical and technical measures to assure such security. We review our data security measures and procedures to ensure compliance with data protection law.

Unfortunately, the transmission of information by means of the Internet, including through e-mail, is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to or from us by means of e-mail and any such transmission is at your own risk. If you have reason to believe that your interaction with us is no longer secure, please notify us immediately.

5. Retaining your Personal Data

We will retain your personal data for the period necessary to fulfil the purposes outlined in this Privacy Statement unless a longer retention period is required or permitted by law.

6. Storing your Personal Data

We may store your information in different places. Physical files are stored in our office and our archives. Electronic files are stored on our secure servers. We may transfer your data to, and store it at, a destination outside of the European Economic Area (EEA). Whenever we transfer your data in such a way, we will ensure appropriate safeguards are in place.

7. Marketing

We may contact you by mail, e-mail, telephone, and text about our products, services and other events which may be of interest to you. You have the right to ask us to stop processing your personal data for direct marketing purposes. If you wish to exercise this right, please send us an e-mail to info@spear.uk.com with a header that says "Unsubscribe".

8. Cookies

If you visit our website to browse, read or download we may collect and store information about your use of the website through certain cookies that are set. Please refer to our Cookies Policy for more detail.





9. Links to other Websites

Where our website contains links to other websites of interest, you should be aware that we do not have control over those websites and therefore cannot be held responsible for the protection and privacy of any personal data you choose to provide whilst visiting such sites.

You should exercise caution and check the Privacy Statement applicable to the website in question.

10. Your rights

- Right to be informed about whether we process your personal data
- Right of access to your personal data
- Right to rectification by us of your data where inaccurate or incomplete
- Right to erasure of your personal data
- Right to restrict processing of your personal data
- Right to data portability
- Right to object to direct marketing

You may exercise your rights by e-mailing us at info@spear.uk.com

Where we process your data solely on the basis of your **consent**, you are entitled to withdraw your consent at any time. This will not affect the lawfulness of our processing before the withdrawal.

You also have the right to lodge a complaint with the Information Commissioner’s Office at any time.

Office of the Information Commissioner

Phone: **0303 123 1113**

On-line: **<https://ico.org.uk/make-a-complaint/>**

11. Changes to our Privacy Statement

We may update this Privacy Statement from time to time and will publish the updated version on our website.

HOW TO CONTACT US

If you would like to contact us with any queries or comments in relation to your personal data, please: Send an e-mail to info@spear.uk.com

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Nick Philpott Naomi Riley Adam Bonning

