

Within the Valeberg Group, we are dedicated to safeguarding and preserving your privacy when visiting our site or communicating electronically with us. This Privacy Policy, together with our Website Terms and Conditions, explains what happens to any personal data that you provide to us or that we collect from you. You must read our Privacy Policy together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you, so that you are fully aware of how and why we are using your data. This Privacy Policy supplements the other notices and is not intended to override them. We update this Policy from time to time, so please review it regularly.

Controller

We, Valeberg, are the Controller of all Personal Data relating to our personnel and personal data used in our business for our commercial purposes (collectively referred to as "we", "us" or "our" in this privacy notice). We have appointed a data protection officer (DPO) who is responsible for overseeing questions about this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please get in touch with the DPO using the details set out below.

Contact details

Name of DPO:	Mr Darren Harris
Email address:	Legal@valeberg.im
Postal address:	Merrion Park, Braddan, Isle of Man, IM4 1BB
Telephone number:	+44 (0) 203 3769 0000

You have the right to make a complaint at any time to the Information Commissioner, the Isle of Man supervisory authority for data protection issues (www.inforights.im). We would, however, appreciate the chance to deal with your concerns before you approach the Information Commissioner, so please get in touch with us in the first instance.

Information We Collect

In operating our website, we may collect and process the following data about you: Details of your visits to our website and the resources that you access, including, but not limited to, traffic data, location data, weblogs and other communication data. Information that you provide by filling in forms on our website, such as when you registered for information. Information provided to us when you communicate with us for any reason.

Use of Cookies

On occasion, we may gather information about your computer for our services and to provide statistical information regarding the use of our website. Such information will not identify you personally; it is statistical data about our visitors and their use of our site. This statistical data does not identify any

personal details whatsoever. Similarly to the above, we may gather information about your general internet use by using a cookie file. Where used, these cookies are downloaded to your computer automatically. This cookie file is stored on the hard drive of your computer, as cookies contain information that is transferred to your computer's hard drive. They help us to improve our website and the service that we provide to you. All computers can decline cookies. This can be done by activating the setting on your browser which enables you to decline cookies. Please note that should you choose to decline cookies, you may be unable to access particular parts of our website.

Use of Your Information

The information that we collect and store relating to you is primarily used to enable us to provide our services to you. In addition, we may use the information for the following purposes:

- To provide you with information requested from us, relating to our services. To provide information on other services which we feel may be of interest to you, where you have consented to receive such information.
- To meet our contractual commitments to you.
- To notify you about any changes to our website, such as improvements to our services.
- If you are a new client, we will only contact you when you have provided consent and only by those means you provided consent for.

Please be advised that we do not reveal information about identifiable individuals to any other third-party service provider to us, but we may, on occasion, provide them with aggregate statistical information about our visitors. You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time. Suppose you opt out of receiving these marketing messages. In that case, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

Storing Your Personal Data

The data that is provided to us is stored on our secure servers. Details relating to any transactions entered into on our site will be encrypted to ensure their safety. The transmission of information via the internet is not entirely secure. Therefore, we cannot guarantee the security of data sent to us electronically, and transmission of such data is thus entirely at your own risk. Where we have given you (or where you have chosen) a password so that you can access certain parts of our site, you are responsible for keeping this password confidential.

Third Party Links

You may find links to third-party websites on our website. These websites should have their privacy policies, which you should check. We do not accept any responsibility or liability for their policies whatsoever, as we have no control over them.

Your Rights

Under certain circumstances, you have rights under data protection laws about your data. Please click on the links below to find out more about these rights:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to the processing of your personal data.
- Request the restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please get in touch with the DPO using the contact details above. You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to request further information regarding your request to expedite our response. We try to respond to all legitimate requests within one month. Occasionally, it may take us longer than a month if your request is particularly complex or you have made several requests. In this case, we will notify you and keep you updated.

Contacting Us

We welcome any queries, comments or requests you may have regarding this Privacy Policy. Please do not hesitate to contact the DPO using the contact details above.

Your Legal Rights

You have the right to:

Request access to your personal data...

(commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction...

of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure...

Of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us to continue processing it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons, which will be notified to you, if applicable, at the time of your request.

Object to processing...

If we rely on your personal data for a legitimate interest (or that of a third party) and your particular situation makes you want to object to processing on this ground because you believe it affects your fundamental rights and freedoms. You also have the right to object when we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information, which override your rights and freedoms.

Request restriction of processing...

of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

if you want us to establish the data's accuracy;

where our use of the data is unlawful, but you do not want us to erase it;

where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or

you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer...

of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time...

where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.