

Denis Group Privacy Policy

Document Number BCR017 (March 2022)

The Denis UK Limited ("We") are committed to protecting and respecting your privacy

This policy (together with Denis UK Limited Terms of Use and Denis UK Limited Cookie Policy and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. For the purpose of the Data Protection Act 1998 (the Act), the data controller is Denis UK Limited of Manor House Luytens Close Chineham Court RG24 8AG.

Information we may collect from you

We may collect and process the following data about you (User Data) in various ways:

- Information that you provide by filling in forms on our site www.denisglobal.com (our site). This includes information provided at the time of registering to use our site, subscribing to our service, posting material or requesting further services. We may also ask you for information when you enter a competition or promotion sponsored by Denis UK Limited, and when you report a problem with our site
- If you contact us, we may keep a record of that correspondence
- We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them
- By use of our cookies (see below)
- Details of transactions you carry out through our site and of the fulfilment of your orders
- Details of your visits to our site including, but not limited to, traffic data, location data, weblogs and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access
- Some User Data will inevitably comprise personal data about you and may include sensitive personal data. Personal data is information which relates to you and allows you to be identified from that data (or from a combination of those data and other information in our possession)
- Sensitive personal data is information about or which reveals your racial or ethnic origin, political opinions, religious, philosophical or similar beliefs, trade union membership, physical or mental health, sexual life, commission of criminal offences and/or involvement in criminal proceedings
- This Privacy Policy describes how we fulfil our obligations under applicable data protection laws. This Privacy Policy is in accordance with the Data Protection Directive 95/46/EC and the respective national Data Protection Acts implementing the Directive. It also complies with the Personal Data (Privacy) Ordinance (Cap. 486) of Hong Kong

Website Analytics

We may partner with selected third-party vendors such as Google Analytics, and others, to allow tracking technologies and remarketing services on the Site [and our mobile application] through the use of first party cookies and third-party cookies, to, among other things, analyse and track users' use of the Site [and our mobile application], determine the popularity of certain content and better understand online activity. By accessing the Site or our mobile application, you consent to the collection and use of your information by these third-party vendors. You are encouraged to review their privacy policy and contact them directly for responses to your questions. We do not transfer personal information to these third-party vendors. However, if you do not want any information to be collected and used by tracking technologies, you can visit the third-party vendor or the Network Advertising Initiative Opt-Out Tool or Digital Advertising Alliance Opt-Out Tool.

Where we store your personal data

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet 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 our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

By continuing to use this website or our services and by providing any personal data (including sensitive personal data) to us via this website or e-mail addresses provided on this website, you are consenting to such transfers, provided that they are in accordance with the purposes set out above and elsewhere in the Legal Notices. Please do not send us any personal data if you do not consent to the transfer of this information to locations outside the User Jurisdiction (including, if applicable, outside the EEA).

Uses made of the information

We use information held about you in the following ways:

- To provide this website or any of our other services to you
- To provide this website or any of our other services to our clients where this requires processing User Data on their behalf
- To improve this website, including without limitation to dealing with your queries and notifying you of any proposed or actual changes to this website
- To improve our services, including without limitation to dealing with your queries and notifying you of any proposed or actual changes to our service provision
- To compile and provide anonymous statistics about our website users and provide related usage information to reputable third parties, which will not in any event enable any third party to identify individuals
- To compile and provide anonymous statistics about our clients or indirect users of our services and provide related usage information to reputable third parties, which will not in any event enable any third party to identify individuals
- To provide you with information you have requested from us, including without limitation to information and brochures requested through this website, our marketing activities (see below) and job applications (see below)
- To provide and market our services to you as a client
- To manage our relationship with you or our clients; and
- To facilitate our internal business operations, including fulfilling any legal requirements

We may also use your data, or permit selected third parties to use your data, to provide you with information about goods and services which may be of interest to you and we or they may contact you about these by post or telephone.

If you are an existing customer, we will only contact you by electronic means (e-mail or SMS) with information about goods and services similar to those which were the subject of a previous sale to you.

If you are a new customer, and where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have consented to this.

If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please tick the relevant box situated on the form on which we collect your data (the order form or registration form).

Disclosure of your information

We may disclose your personal information to any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.

We may disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets
- If we or substantially all of our assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets

- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply **Denis UK Limited Terms of Use** and other agreements; or to protect the rights, property, or safety of us, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction

Consent

By continuing to use our services (whether directly or through third party arrangements) or this website and by providing any personal data (including sensitive personal data) to us, you are consenting to our use of your personal data as set out in this Privacy Policy. Please do not send us any personal data if you do not want that information to be used by us in this manner.

Your rights

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at Head of Legal, Denis UK Limited, Manor House Luytens Close Chineham Court, Basingstoke, RG24 8AG.

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

Under the Data Protection Act (the "Act") you have the right to request a copy of the personal information Denis UK Limited holds about you and to have any inaccuracies corrected. (We charge £10 for information requests and require you to prove your identity with 2 pieces of approved identification). We will use reasonable efforts to supply, correct or delete personal information about you on our files. Please address requests and questions about this or any other question about this Privacy Policy to the Head of Legal, Denis UK Limited, Manor House Luytens Close Chineham Court, Basingstoke, RG24 8AG.

Access to information

The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a fee of £10 to meet our costs in providing you with details of the information we hold about you.

Changes to our privacy policy

This Privacy Policy and/or the other policies may be amended by us at any time. Please check this website periodically to inform yourself of any changes.

Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to the Head of Legal, Denis UK Limited, Manor House Luytens Close Chineham Court RG24 8AG.