

At Equa Via Systems Limited ("Equa Via"), we are committed to protecting your privacy and this Privacy Policy tells you how we collect, use and disclose your personal data.

This Privacy Policy has been drafted to comply with the legal standards that currently exist in the United Kingdom and will be modified as Equa Via determines is necessary to satisfy or exceed legal requirements.

We reserve the right to modify this Privacy Policy at any time by notifying our customers, via the main Equa Via Web site (www.pastel.co.uk) of a new or revised Privacy Policy. These modifications will only apply to personal data that you provide to us after the date of the modification, except as may be required by law.

If you would like further information on this Privacy Policy or about Equa Via's use of your personal data, we encourage you to contact Equa Via's Data Protection Administration (see below). For details concerning your rights under the Data Protection Act 1998, and other applicable legislation, contact the Information Commissioner (ico.gov.uk).

What is Personal Data?

"Personal data" is data that can be used to identify you as an individual, and includes your name, mailing address, telephone number, credit card number and may include your email address. We collect your Personal Data through your purchase orders, product registrations or enquiries, as well as from third parties who have advised that they are authorised to share your personal data with us.

How we use Personal Data:

In addition to the above uses, we may also use your personal data for the following additional purposes and direct marketing ("Additional Purposes") where you have given us appropriate permission:

- To tell you about special discounts on Equa Via products and services
- To advise you about new Equa Via products and services
- To advise you about offers from other companies that Equa Via feels may be of interest to you. *In these instances, Equa Via forwards the offer to you but does not share your personal data with these other companies.*

To help us improve our products and services and develop new ones, we may also create **aggregate data** that uses your personal data but in a manner that will not identify you as an individual. For example, we may look at your address to help identify the total number of users of a particular product in a geographic area. Aggregate data is not personal data, as it cannot be used to identify any particular individual.

Occasionally, we may invite you to participate in a survey or provide additional personal data that will enable us to better understand and serve your needs. Any information request marked as optional gives you the freedom to decide whether to respond. Please keep in mind that all information you provide may be used to personalise and improve our customer service operations.

Equa Via may use certain third-party service providers to help us fulfil your requests. For example, we may use third party service providers to process your credit card payments or ship to you a product that you ordered.

In these instances, these third-party service providers are under a contractual duty to restrict their use of personal data to the limited purpose(s) specified by Equa Via, which at all times shall be consistent with this Privacy Policy. Unless otherwise specified in this Privacy Policy, your personal data will not be transferred to a third party for their independent use without your express consent.

In addition, you should be aware that there are very limited instances under law in which we may be required to disclose the personal data of our customers. If such an instance arises, we shall only release that personal data as required by law.

Marketing Materials

We want you to have control over the ways in which we will initiate contact with you to provide you with information and materials for the Additional Purposes ("Marketing Materials"). We will provide you with Marketing Materials by telephone and facsimile (*as to individuals only*) if you have previously notified us that you consent to receiving such calls or facsimiles.

If you are a business and do not want to receive Marketing Materials by facsimile, just let us know.

For those individuals that have previously notified us that they consent to receiving Marketing Materials by email, we shall restrict those emails to products/services that are similar to those in which the individuals have expressed an interest.

If you want to give or withdraw your consent to receiving Marketing Materials in any medium, simply notify Equa Via. (See "Privacy Policy questions & updating Your Personal Data", below.) If you advise Equa Via that you do not want to receive Marketing Materials, Equa Via shall not be able to provide you with information concerning special discounts and offers for which you may be eligible, or new products or services that may be of interest to you. Equa Via does not use text messaging or automated calling systems to disseminate Marketing Materials.

Cookies

We take a responsible approach to cookies, which complies with the revised Privacy & Electronic Communications Regulations. By continuing to use the site, you give us your consent to our use of cookies. NEW

A "cookie" is a small bit of data that gets stored on your computer RAM or hard drive when you access particular Web sites. If you accept cookies, your browser adds this data in a small file on your computer. If you do not want to accept cookies or would like to be notified before a cookie is loaded on your computer, modify your browser setting accordingly.

The setting that controls cookies can be modified on most browsers by clicking on "Tools" on the menu bar of the browser, then clicking "Internet Options," and going to the tab marked "Privacy" where you can specify how you want to manage cookies. Here are some examples of how Equa Via may use cookies:

To make a purchase through the Equa Via online store, you must accept those cookies that supply your browser with a unique identifier, which we use to identify a previous visitor to our Web site and to better understand aggregate use of our Web site. This information enables us to know what areas of the site users prefer and how users navigate through the Web site.

We also use this information to group your online behaviour with other similar types of customers to learn more about those types of products in which you have an interest. If you do not accept these cookies and would like to purchase a Equa Via product or service, you may complete most transactions by calling Equa Via at 0845 456 3103.

Some of our Web sites may require users to register in order to use the online service. Registered users are given a cookie when they login, which will be maintained by their browser, and contains an identifier. This cookie authenticates the registered users' identity and permits them to access those portions of the site that are limited to registered users.

Some of our software products require online activation or online download. In these instances, cookies are required in order for us to authenticate the software, activate the software, confirm your eligibility to use the software, and/or to electronically provide you with the software and/or related updates.

On Equa Via.co.uk, we only use Google Analytics cookies, which give us anonymous details about the visits to our site. We use this information to make browsing the site easier.

On support.Equa Via.co.uk, we set cookies when you log into the site, to allow us to give you access to your tickets.

Links to Non-Equa Via Web sites

Our Web site may provide links from our Web site to third party Web sites. If you click on a banner advertisement or third party link, the "click" will take you off the Equa Via Web site. Once you leave any Equa Via Web site, any information that you provided to us remains with us and is not forwarded to the next site to which you have linked.

Any personal data or other information that is collected by, or which you choose to provide any third party Web site will be subject to the privacy policy of the operators of the third party Web site. Equa Via is not responsible for the use or protection of personal data you disclose to a third party Web site operator, even if reached from a Equa Via Web site.

Any site that is a Equa Via co-branded Web site will clearly identify both Equa Via and the third-party, and any personal data or other information collected through these co-branded sites may be collected and used by both Equa Via and the third-party unless otherwise stated on that co-branded site.

Protection of Personal Data

All personal data is collected and stored in a secure manner and is used strictly in relation to this policy and your stated privacy preferences. We employ industry recognized security safeguards to protect personal data that you have provided to us from loss, misuse and unauthorized alteration.

When you transmit information to us such as a credit card or bank account number through the Equa Via Web Site, we provide you access to our server that allows 128-bit encryption of that data as it travels across the Internet. However, under no circumstances, will Equa Via be responsible or liable for loss of privacy, disclosure of information, harm, damage or loss that may result from your transmission of any information to us in any medium.

Privacy Policy questions & updating your Personal Data

We encourage you to provide feedback on, and to ask questions about, this Privacy Policy, as well as to review and update your personal data as maintained by Equa Via.

At any time you may change your preferences as to the use of your personal data or receipt of Marketing Materials, or request that we delete your personal data from our files. All such communications and inquiries should be sent in writing at one of the following addresses, and we shall respond promptly:

Equa Via Systems Limited

Pennine House

Denton Lane

OLDHAM

OL9 8PU

Or by E-Mail: - privacy@EquaVia.co.uk

Please be sure to include sufficient information for us to verify your identity, and locate your file (if applicable), and respond to your inquiry. You should also include your mailing address if you would like us to send you any written materials. Equa Via reserves the right to take reasonable steps to verify any requests for personal data it receives.