

FIREFLY PRIVACY POLICY

Firefly Technology Limited, a company registered in England and Wales under company registration number 4123381 and whose main trading address is Unit 8, City Business Centre, Hyde Street, Winchester, Hampshire, SO23 7TA United Kingdom ("We," "our" and/or "us"), treats with the utmost care and respect the personal information you may supply to us along with the confidentiality of any information you provide us with and is committed to protecting and respecting your privacy.

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed/used by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

Data Protection Legislation

We are registered under current data protection legislation and comply with such legislation including The General Data Protection Regulations 2018 (GDPR) in all our dealings with your personal data. The data controller is Firefly Technology Limited.

INFORMATION WE MAY COLLECT FROM YOU:

We may collect and process the following data about you:

- Identity data: first, last name and title.
- Contact data: Business name, postal address, registered address, billing address, delivery address, email address and telephone numbers
- Financial data: Bank Account details
- Information that you supply to us by email, telephone or written correspondence.
- If you contact us, we may keep a record of that correspondence.
- Details of transactions you carry out as a customer of ours and of the fulfilment of your orders.

DATA SECURITY:

We use every reasonable commercial effort to take precautions – including administrative, technical, and physical measures – to safeguard your personal information against loss, theft, and misuse, as well as unauthorized access, disclosure, alteration, and destruction.

In addition, we limit access to your personal data to those employees, agents, contractors or other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

All information you provide to us is stored on our hosting company's servers. Copies are held on our server. Also stored in hardcopy format in locked, hanging file cupboards in our office, access by authorised keyholder only.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Our Website (www.fireflytech.com) may, from time to time, contain links to and from the websites of our partner networks, advertisers, affiliates, suppliers or other third parties.

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.

DATA RETENTION:

We will only retain your data for as long as necessary to fulfil the purposes we collected for including for the purposes of satisfying any legal, accounting or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means and the applicable legal requirements.

USES MADE OF THE INFORMATION:

We use information held about you in the following ways:

- To carry out our obligations arising from any contracts entered into between you and us.
- To provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes.
- To notify you about changes to our service.
- To progress orders.

Our databases are live, updates are made on an on-going basis. Contacts are removed when we are made aware that they no longer work with a company.

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

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 Firefly Technology Limited or substantially all of its 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 to protect the rights, property, or safety of Firefly Technology Limited, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

We may use the following third-party service providers named below to process and store your data:

Dropbox (Dropbox, Inc.), which we use to store files and documents of which you submit to us or that we create on your behalf. Read their privacy policy: (<https://www.dropbox.com/privacy>)

Sage 50 Accounts (Sage UK Ltd), which we use to process and store customer data pertaining to invoices and accounting. Read their privacy policy: (<http://www.sage.com/company/privacy-notice-and-cookies>)

Pipedrive, which we use as our Customer Relationship Management system to store your data and correspondence. Read their privacy policy: (<https://www.pipedrive.com/en/privacy>)

Google Analytics, which we use to track and report on our website traffic. Read their Privacy Policy: <https://policies.google.com/privacy>

Delivery companies (including DHL, Fed-Ex etc) for the purposes of delivering goods to you once we have entered into a commercial contract with you.

Be assured that Firefly Technology Ltd does not supply, sell or rent your contact information to other marketers.

YOUR RIGHTS:

You have the right:

- To access the personal data held by us about you.
- To request correction of personal data we hold about you.
- To ask us not to process your personal data for marketing purposes.
- To request that we cease processing your personal data.
- To request erasure of your personal data.
- To request your data be transferred to either yourself or another service provider.
- To withdraw consent.
- To file a complaint with the Data Protection Regulator, in the UK this is the Information Commissioners Office. Details at www.ico.org.uk

ACCESS TO INFORMATION:

You have the right to see personal data (as defined in current data protection legislation including the GDPR) that we keep about you, upon receipt of a written request.

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 clearly unfounded, repetitive or excessive. Alternatively we may refuse to comply with your request in these circumstances.

We try to respond to all legitimate requests within one month.

GENERAL:

You can exercise your rights as stated above at any time by contacting us. Questions, comments and requests regarding this privacy policy are welcomed also and should be addressed to Firefly Technology Ltd, Unit 8, City Business Centre, Hyde Street, Winchester, Hampshire, SO23 7TA. United Kingdom. info@fireflytech.com or Tel: 01256 884980.

In the event that you wish to complain about how we have handled your personal data, you may make a formal complaint in writing and we will look in to your complaint and work with you to resolve the matter.

If you still feel that your personal data has not been handled appropriately according to the law, you can contact the ICO and file a complaint with them.

<https://ico.org.uk/concerns/handling>