

[FOR DISTRIBUTION VIA WEBSITE]

This privacy policy applies between you, the User of this Website, and Environmental Alliance Project CIC, the owner and provider of this Website. The Environmental Alliance Project CIC takes the privacy of your information very seriously. This privacy policy applies to our use of any and all Data collected by us or provided by you in relation to your use of the Website.

This privacy policy should be read alongside, and in addition to, our Terms and Conditions, which can be found here: [Coming Soon]

Please read this policy carefully.

1. Definitions and Interpretations

1.1. In this privacy policy, the following definitions are used:

Data	Collectively all information that you submit to the
	Environmental Alliance Project CIC via the Website.
	This definition incorporates, where applicable, the
	definitions provided in the Data Protection Laws.
Data Protection Laws	Any applicable law relating to the processing of
	personal Data, including but not limited to the UK
	General Data Protection Regulations (UK GDPR) and
	the Data Protection Act 2018 (DPA 18), and any
	national implementing or supplementary laws,
	regulations and secondary legislation;
Environmental Alliance	Environmental Alliance Project CIC, a company
Project	incorporated in England and Wales with registered
	number 13497187, whose registered office is at 37
We or Us	Southgate Street, Winchester, Hampshire, SO23 9EH.
User or You	Any third party that accesses the Website and is not
	either (i) employed by Environmental Alliance Project
	CIC and acting in the course of their employment or
	(ii) engaged as a consultant or otherwise providing
	services to Environmental Alliance Project CIC and
	accessing the website in connection with the
	provision of such services; and
Website	The website that you are currently using,
	https://eap.eco, and any sub-domain of this site
	unless expressly excluded by their own terms and
	conditions.

1.2. In this privacy policy, unless the context requires a different interpretation:

- 1.2.1. The singular includes the plural and vice versa;
- 1.2.2. References to sub-clauses, clauses, schedules or appendices are to subclauses, clauses, schedules or appendices of this privacy policy;
- 1.2.3. A reference to a person includes firms, companies, government entities, trusts and partnerships;
- 1.2.4. "including" is understood to mean "including without limitation";
- 1.2.5. Reference to any statutory provision includes any modification or amendment of it;
- 1.2.6. The headings and sub-headings do not form part of this privacy policy

2. Scope of this privacy policy

- 2.1. This privacy policy applies only to the actions of Environmental Alliance Project CIC and Users with respect to this Website. It does not extend to any websites that can be accessed from this Website including, but not limited to, any links we may provide to social media websites.
- 2.2. For purposes of the applicable Data Protection Laws, Environmental Alliance Project CIC is the "data controller". This means that Environmental Alliance Project CIC determines the purpose for which, and the manner in which, your Data is processed.

3. Data Collected

- 3.1. We may collect the following Data, which includes personal Data, from you:
- 3.1.1. Name;
- 3.1.2. Date of Birth;
- 3.1.3. Job Title;
- 3.1.4. Profession;
- 3.1.5. Contact information such as email addresses and telephone numbers;
- 3.1.6. Demographic information such as postcode, preferences and interests;
- 3.1.7. Financial information such as credit/debit card numbers;
- 3.1.8. IP Address (automatically collected);
- 3.1.9. Web browser type and version (automatically collected);
- 3.1.10. Operating System (automatically collected);
- 3.1.11. A list of URLs starting with a referring site, your activity on this Website, and the site you exit to (automatically collected);

In each case, in accordance with this privacy policy.

4. How We Collect Data

- 4.1. We collect Data in the following ways:
- 4.1.1. Data is given to us by you; and
- 4.1.2. Data is automatically collected

5. Data that is Given to us by You

- 5.1. Environmental Alliance Project CIC, will collect your Data in a number of ways, for example:
 - a. When you contact us through the website, by telephone, e-mail or through any other means;
 - b. When you register with us and set up an account to receive services;
 - c. When you elect to receive marketing communications from us;

In each case, in accordance with this privacy policy.

6. Data that is Collected Automatically

- 6.1. To the extent that you access the website, we will collect your Data automatically, for example:
 - a. We automatically collect some information about your visit to the Website. This information helps us to make improvements to Website content and navigation, and includes your IP address, the date, times and frequency with which you access the Website and the way you use and interact with its content.

7. Our Use of Data

- 7.1. Any or all of the above Data may be required by us from time to time in order to provide you with the best possible service and experience when using our website. Specifically, Data may be used by us for the following reasons:
 - a. Internal record keeping;
 - b. Improvement of our services;
 - c. Transmission by email of marketing materials that may be of interest to you;
 - d. Contact for market research purposes which may be done using email or telephone. Such information may be used to customise or update the website;

In each case, in accordance with this privacy policy.

- 7.2. We may use your Data for the above purposes if we deem it necessary to do so for our Legitimate Interest (as defined by UK GDPR). If you are not satisfied with this, you have the right to object in certain circumstances (see the section headed "Your Rights" below).
- 7.3. For the delivery of direct marketing to you via email, we'll need your consent, whether via an opt-in or soft-opt-in:
 - a. Soft opt-in consent is a specific type of consent which applies when you have previously engaged with us (for example, you contact us to ask us for more details about a particular service, and we are marketing similar products/services). Under "soft opt-in" consent, we will take your consent as given unless your opt-out.
 - b. For other types of e-marketing, we are required to obtain your specific consent; that is, you need to take positive and affirmative action when consenting by, for example, checking a tick box that we will provide.
 - c. If you are not satisfied with our approach to marketing, you have the right to withdraw consent at any time. To find out how to withdraw your consent, see the section headed "Your Rights" below.
- 7.4. When you register with us and set up an account to receive our services, the legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

8. Who We Share Data With

- 8.1. We may share your Data with the following groups of people for the following reasons:
- 8.1.1. Any of our affiliated companies;
- 8.1.2. Our employees, agents and/or professional advisors/consultants;

In each case, in accordance with this privacy policy.

9. Keeping Data Secure

- 9.1. We will use technical and organisational measures to safeguard your Data, for example:
 - a. Access to your account is controlled by a password and a user name that is unique to you.
 - b. We store your Data on secure servers.
 - c. Payment details are encrypted using SSL technology (typically you will see a lock icon or green address bar (or both) in your browser when we use this technology.
- 9.2. Technical and organisational measures include measures to deal with a suspected data breach. If you suspect any misuse or loss or unauthorised access to your Data, please let us know immediately by contacting us at this email address: stuart@eap.eco.
- 9.3.If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses, and many other online problems, visit <u>www.getsafeonline.org</u>. Get Safe Online is supported by HM Government and leading businesses.

10. Data Retention

- 10.1. Unless a longer retention period is required or permitted by law, we will only hold your Data on our systems for the period necessary to fulfil the purposes outlined in this privacy policy or until you request that the Data be deleted.
- 10.2. Even if we delete your Data, it may persist on backup or archival media for legal, tax or regulatory purposes.

11. Your Rights

- 11.1. You have the following rights in relation to your Data:
- a. Right to Access

the right to request (i) copies of the information we hold about you at any time, or (ii) that we modify, update or delete such information. If we provide you with access to the information we hold about you, we will not charge you for this, unless your request is "manifestly unfounded or excessive". Where we are legally permitted to do so, we may refuse your request. If we refuse your request, we will tell you the reasons why.

b. Right to Correct

the right to have your Data rectified if it is inaccurate or incomplete.

c. Right to Erase

the right to request that we delete or remove your Data from your systems.

d. Right to Restrict our Use of Your Data

the right to "block" us from using your Data or limit the way in which we can use it.

e. Right to Data Portability

the right to request that we move, copy, or transfer your Data.

f. Right to Object

the right to object to our use of your Data including where we use it for our legitimate interests.

- 11.2. To make enquiries, exercise any of your rights set out above, or withdraw your consent to the processing of your Data (where consent is our legal basis for processing your Data), please contact us via this email address: stuart@eap.eco.
- 11.3. If you are not satisfied with the way a complaint you make in relation to your Data is handled by us, you may be able to refer your complaint to the relevant data protection authority. For the UK, this is the Information Commissioner's Office (ICO). The ICO's contact details can be found on their website at https://ico.org.uk.
- 11.4. It is important that the Data we hold about you is accurate and correct.Please keep us informed if your Data changes during the period for which we hold it.

12. Links to Other Websites

12.1. This Website may, from time to time, provide links to other websites. We have no control over such websites and are not responsible for the content of these websites. This privacy policy does not extend to your use of such websites. You are advised to read the privacy policy or statement of other websites prior to using them.

13. Changes of Business Ownership and Control

13.1. Environmental Alliance Project CIC may, from time to time, expand or reduce our business and this may involve the sale and/or transfer of control of all or part of Environmental Alliance Project CIC (but only in compliance with the Asset Lock, a principle of Community Interest Companies in the UK). Data provided by Users will, where it is relevant to any part of your business so transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this privacy policy, be permitted to use the Data for the purposes for which it was originally supplied to us.

14. General

- 14.1. You may not transfer any of your rights under this privacy policy to any other person. We may transfer our rights under this privacy policy where we reasonably believe your rights will not be affected.
- 14.2. If any court or competent authority finds that any provision of this privacy policy (or part of any provision) is invalid, illegal, or unenforceable, that provision or part-provision will, to the extent required, be deemed to be deleted, and the validity and enforceability of the other provisions of this privacy policy will not be affected.
- 14.3. Unless otherwise agreed, no delay, act or omission by a party in exercising any right or remedy will be deemed a waiver of that, or any other, right or remedy.
- 14.4. This Agreement will be governed by and interpreted according to the law of England and Wales. All disputes arising under this Agreement will be subject to the exclusive jurisdiction of the English and Welsh courts.

15. Changes to this Privacy Policy

15.1. Environmental Alliance Project CIC reserves the right to change this privacy policy as we may deem necessary from time to time or as may be required by law. Any changes will be immediately posted on the Website and you are deemed to have accepted the terms of the privacy policy on your first use of the Website following the alterations.

You may contact Environmental Alliance Project CIC by email at <u>stuart@eap.eco</u>.