

Adventoris Ltd is committed to protecting and preserving your privacy.

This policy (together with our Terms and Conditions) 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 online or on our mobile service, will be processed by us. Please read the following privacy policy to understand how we use and protect the information you provide to us. This Policy applies as between you, the User of this Website and Adventoris Ltd the owner and provider of this Website. This Policy applies to our use of any and all Data collected by us in relation to your use of the Website.

1. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

“Adventoris Ltd”	means Adventoris Ltd of 3M Buckley Innovation Centre, Firth Street Huddersfield. HD1 3BD;
“Cookie”	means a small text file placed on your computer by this Website when you visit certain parts of the Website and/or when you use certain features of the Website. Details of the cookies used by this Website are set out in Clause 12;
“Data”	means collectively all information that you submit to the SwiftCloud Application via the Website. This definition shall, where applicable, incorporate the definitions provided in the Data Protection Act 1998;
“SwiftCloud”	means the SwiftCloud application (or app) which is the cloud based platform which will allow the User to receive sales orders directly from its customers via a mobile sales application;
“UK and EU Cookie Law”	means the Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended by the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011;
“Website”	means the website that you are currently using (www.swiftcloud.co.uk, www.swiftserver.co.uk; www.adventoris.com) and any sub-domains of this site unless expressly excluded by their own terms and conditions.

2. Scope of this Policy

This Policy applies only to the actions of Adventoris Ltd 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.

3. Data Collected

Without limitation, any of the following Data may be collected by this Website from time to time:

- 3.1 name;
- 3.2 gender;
- 3.3 job title;
- 3.4 profession;

- 3.5 contact information such as email addresses and telephone numbers;
- 3.6 demographic information such as post code, preferences and interests;
- 3.7 IP address (automatically collected);
- 3.8 web browser type and version (automatically collected);
- 3.9 operating system (automatically collected);
- 3.10 a list of URLs starting with a referring site, your activity on this Website, and the site you exit to (automatically collected); and

4. **Our Use of Data**

- 4.1 Any personal Data you submit will be retained by Adventoris Ltd.
- 4.2 Unless we are obliged or permitted by law to do so, and subject to Clause 5, your Data will not normally be disclosed to third parties. This does not include our affiliates and / or other companies within our group. Data may be disclose to 3rd parties in the following circumstances:
 - 4.2.1 to provide or to help us improve the services you have asked for or subscribed to;
 - 4.2.2 to provide information for legal or regulatory purposes;
 - 4.2.3 as part of current or future legal proceedings; or
 - 4.2.4 to enable us to manage your account.
- 4.3 All personal Data is stored securely in accordance with the principles of the Data Protection Act 1998. For more details on security see Clause 11 below.
- 4.4 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:
 - 4.4.1 internal record keeping;
 - 4.4.2 improvement of our products / services;
 - 4.4.3 transmission by email of promotional materials that may be of interest to you;
 - 4.4.4 contact for market research purposes which may be done using email, telephone, fax or mail. Such information may be used to customise or update the Website.
 - 4.4.5 for processing your enquiries, orders or applications;
 - 4.4.6 for credit checks and to manage your accounts;
 - 4.4.7 to provide you with other services which you could have from time to time. (We will only contact you in this way if you have previously shown your consent);
 - 4.4.8 to help to run any accounts, services and products which we provide now or in the future (or have previously provided);
 - 4.4.9 to carry out any marketing analysis, profiling or create statistical or testing information
 - 4.4.10 to recover debts
 - 4.4.11 to prevent and detect fraud or loss
 - 4.4.12 to update our records about you;
 - 4.4.13 to prevent money laundering; and
 - 4.4.14 to identify you when you contact us.

5. Third Party Websites and Services

- 5.1 Adventoris Ltd may, from time to time, employ the services of other parties for dealing with matters that may include, but are not limited to, payment processing, search engine facilities, advertising and marketing. The providers of such services may have access to certain personal Data provided by Users of this Website.
- 5.2 Any Data used by such parties is used only to the extent required by them to perform the services that Adventoris Ltd requests. Any use for other purposes is strictly prohibited. Furthermore, any Data that is processed by third parties shall be processed within the terms of this Policy and in accordance with the Data Protection Act 1998.

6. Links to Other Websites

This Website may, from time to time, provide links to other websites. Adventoris Ltd has no control over such websites and is in no way responsible for the content. This Policy does not extend to your use of such websites. Users are advised to read the privacy policy or statement of other websites prior to using them.

7. Changes of Business Ownership and Control

- 7.1 Adventoris Ltd may, from time to time, expand or reduce our business and this may involve the sale and/or the transfer of control of all or part of Adventoris Ltd. Data provided by Users will, where it is relevant to any part of our business so transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Policy, be permitted to use the Data for the purposes for which it was originally supplied to us.
- 7.2 In the event that any Data submitted by Users is to be transferred in such a manner, you will not be contacted in advance and informed of the changes.

8. Controlling Use of Your Data

- 8.1 Wherever you are required to submit Data, you will be given options to restrict our use of that Data. This may include the following:
- 8.1.1 use of Data for direct marketing purposes; and
 - 8.1.2 sharing Data with third parties.

9. Your Right to Withhold Information

You may access certain areas of the Website without providing any Data at all. However, to use all features and functions available on the Website you may be required to submit certain Data.

10. Accessing your own Data

You have the right to ask for a copy of any of your personal Data held by Adventoris Ltd (where such data is held) on payment of a small fee which is currently £15.

11. Security

- 11.1 Data security is of great importance to Adventoris Ltd and to protect your Data we have put in place suitable physical, electronic and managerial procedures to safeguard and secure Data collected via this Website.
- 11.2 Specifically we use the following systems:
- 11.2.1 Cisco Firewall technology; or
 - 11.2.2 SonicWall Firewall technology; and
 - 11.2.3 At least 128 Bit Advanced Encryption Standard (AES)

12. Cookies

- 12.1 This Website may place and access certain Cookies on your computer. Adventoris Ltd uses Cookies to improve your experience of using the Website and to improve our

range of products and services. Adventroris Ltd has carefully chosen these Cookies and has taken steps to ensure that your privacy is protected and respected at all times.

12.2 All Cookies used by this Website are used in accordance with current UK and EU Cookie Law.

12.3 Before the Website places on your computer, subject to sub-Clause 12.4, you will be presented with a pop up message requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling Adventroris Ltd to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of the Website may not function fully or as intended.

12.4 Certain features of the Website depend upon Cookies to function. UK and EU Cookie Law deems these Cookies to be “strictly necessary”. These Cookies are shown below. Your consent will not be sought to place these Cookies. You may still block these cookies by changing your internet browser’s settings as detailed below.

12.5 This Website places the following Cookies:

Name of Cookie	Purpose	Strictly Necessary
Send_login_username	To capture the users login details	No

12.6 You can choose to enable or disable Cookies in your internet browser. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser.

12.7 You can choose to delete Cookies at any time however you may lose any information that enables you to access the Website more quickly and efficiently including, but not limited to, personalisation settings.

12.8 It is recommended that you ensure that your internet browser is up-to-date and that you consult the help and guidance provided by the developer of your internet browser if you are unsure about adjusting your privacy settings.

13. **Consent and Changes to Privacy Policy**

Adventroris Ltd reserves the right to change this 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 Policy on your first use of the Website following the alterations. By using this website or our mobile applications you are consenting to this privacy policy.

Please note that this policy will be reviewed and may change from time to time. The revised policy will be posted to this page so that you are always aware of the information we collect, how we use it and under what circumstances we disclose it.

14. **Decision Making**

Any decision made by us in relation to the services provided to you shall be final

15. **Contact Us**

If you feel we have breached your privacy, then please write to:

Adventroris Ltd
3M Buckley Innovation Centre
Firth Street
Huddersfield
HD1 3BD
Or call customer services on 03333 447 557.