
PRIVACY POLICY

BACKGROUND:

This Policy applies as between you, the User of this Website and Vortex Global Limited 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:

“Data”	means collectively all information that you submit to the Vortex Global Limited via the Website. This definition shall, where applicable, incorporate the definitions provided in the Data Protection Act 1998;
“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;
“Vortex Global Limited”	means Vortex Global Limited of 24 Evans Business Centre Lingfield Way, Darlington, County Durham, DL1 4PS, United Kingdom;
“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;
“User”	means any third party that accesses the Website and is not employed by Vortex Global Limited and acting in the course of their employment; and
“Website”	means the website that you are currently using (http://www.vortexglobal.com) and any sub-domains of this site (e.g. subdomain. http://de.vortexglobal.com) unless expressly excluded by their own terms and conditions.

2. Scope of this Policy

This Policy applies only to the actions of Vortex Global Limited 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 business name;
- 3.3 contact information such as email addresses and telephone numbers;
- 3.4 demographic information such as post code, business country, preferences and interests;
- 3.5 IP address (automatically collected); and
- 3.6 a list of URLs starting with a referring site, your activity on this Website, and the site you exit to (automatically collected);

4. Our Use of Data

- 4.1 Any personal Data you submit will be retained by Vortex Global Limited.
- 4.2 Unless we are obliged or permitted by law to do so, and subject to Clause 5, your Data will not be disclosed to third parties. This does not include our affiliates and / or other companies within our group.
- 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.

5. Third Party Websites and Services

- 5.1 Vortex Global Limited 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, delivery of purchased items, search engine facilities, advertising and marketing. The providers of such services do not have access to certain personal Data provided by Users of this Website.

6. Links to Other Websites

This Website may, from time to time, provide links to other websites. Vortex Global Limited has no control over such websites and is in no way responsible for the content thereof. 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 Vortex Global Limited 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 Vortex Global Limited. 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**

9.1 You may access 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.

9.2 You may restrict your internet browser's use of Cookies. For more information see Clause 12.

10. **Accessing your own Data**

You have the right to ask for a copy of any of your personal Data held by Vortex Global Limited (where such data is held).

11. **Security**

11.1 Data security is of great importance to Vortex Global Limited 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.

12. **Cookies**

12.1 This Website may place and access certain first party Cookies on your computer. First party cookies are those placed directly by Vortex Global Limited via this Website and are used only by Vortex Global Limited. Vortex Global Limited uses Cookies to improve your experience of using the Website and to improve our range of products. Vortex Global Limited has carefully chosen these Cookies and has taken steps to ensure that your privacy is protected and respected at all times.

12.2 By using this Website you may receive certain third party Cookies on your computer. Third party cookies are those placed by websites and/or parties other than Vortex Global Limited. Third party cookies are used on this Website for analytics and are detailed in full below. These cookies are not integral to the services provided by the Website.

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

- 12.4 Cookies are placed on your computer sub-Clause 12.8, you will be presented with a message bar, on the top of the web site notifying those Cookies were set. By giving your consent to the placing of Cookies you are enabling Vortex Global Limited to provide the best possible experience and service to you.

The following first party Cookies may be placed on your computer:

Name of Cookie	Purpose	Strictly Necessary
_icl_current_language	This identifies to the website what language you are viewing in.	No
PHPSESSID	Stores preferences for the website to show the correct language for the user.	No

and the following third party Cookies may be placed on your computer:

Name of Cookie	Provider	Purpose
N/A	N/A	N/A

- 12.5 This Website uses analytics services provided by Google Analytics. Website analytics refers to a set of tools used to collect and analyse usage statistics, enabling us to better understand how Users use the Website. This, in turn, enables us to improve the Website and the services offered through it. You do not have to allow us to use these Cookies, as detailed below, however whilst our use of them does not pose any risk to your privacy or your safe use of the Website, it does enable us to continually improve our business.
- 12.6 The analytics services used by this Website use Cookies to gather the required information. Certain of these Cookies may be placed immediately when you decide to visit the Website and it may not be possible to obtain your prior consent. You may remove these Cookies and prevent future use of them by following the steps set out below.
- 12.7 The analytics services used by this Website use the following Cookies:

Name of Cookie	First / Third Party	Provider	Purpose
_ga	Third	Google	Used to distinguish users.
_gat	Third	Google	Used to throttle request rate.
__utma	Third	Google	Used to distinguish users and sessions. The cookie is created when the javascript library executes and no existing __utma cookies exists. The cookie is updated every time data is sent to Google Analytics.
__utmt	Third	Google	Used to throttle request rate.
__utmb	Third	Google	Used to determine new sessions/visits. The cookie is created when the javascript library executes and no existing __utmb cookies exists. The cookie is updated every time data is sent to Google Analytics.
__utmc	Third	Google	Not used in ga.js. Set for interoperability with urchin.js. Historically, this cookie operated in conjunction with the __utmb cookie to determine whether the user was in a new session/visit.
__utmz	Third	Google	Stores the traffic source or campaign that explains how the user reached your site. The cookie is created when the javascript library executes and is updated every time data is sent to Google Analytics.
__utmv	Third	Google	Used to store visitor-level custom variable data. This cookie is created when a developer uses the _setCustomVar method with a visitor level custom variable. This cookie was also used for the deprecated _setVar method. The cookie is updated every time data is sent to Google Analytics.

12.8 You can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all

cookies or only third party cookies. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser.

12.9 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.

12.10 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. **Changes to this Policy**

Vortex Global Limited 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.