

SMART BUY WEBSITE PRIVACY POLICY

1. DEFINITIONS:

Directives	EU Data Protection Directive (95/46/EC) and the subsidiary directives as implemented by English Law by the Data Protection Act 1998
Personal Information	all personal data and/or sensitive personal data (as defined by the Data Protection Act 1998)
Terms	the conditions set out in this document including Our Terms and Conditions of Use
Site	www.smartbuy-catalogue.com
We/Us/Our	Helionova Limited trading as Smart Buy of Hyperion House 19 Frensham Road Sweet Briar Industrial Estate Norwich NR3 2BT
You/Your	the person company or party who uses Our Site

2. GENERAL:

- 2.1 This website is owned and operated by Us and accessible at URL www.smartbuy-catalogue.com
- 2.2 We are the controller of all Personal Information collected on this Site
- 2.3 We believe strongly in protecting the privacy of all Site users and this Privacy Policy sets out how We use Your Personal Information
- 2.4 We will only use the Personal Information that We collect about You in full compliance with the Directives and will continue to ensure that Our policies and practices comply in all respects with any future laws and regulations in relation to Your privacy
- 2.5 From time to time it may be necessary for Us to change this Privacy Policy so We suggest that You check here periodically

3. YOUR CONSENT AND ACKNOWLEDGEMENT:

- 3.1 Unless You have expressly indicated otherwise Your use of the Site constitutes Your consent to the collection use and transfer of Your Personal Information under the Terms of our Privacy Policy
- 3.2 You acknowledge and agree that Our [Website Terms and Conditions of Use](#) and Our [Website Terms and Conditions of Sale](#) apply to this Privacy Policy as if reproduced here in full
- 3.3 If You do not agree to the Terms of this Privacy Policy and those referred to in 3.2 You may not use our Site
- 3.4 If You have any questions concerns or comments about this Privacy Policy and/or Our collection use or the accuracy of Your Personal Information or if You wish to see any of the Personal Information We hold on You or if You wish Us to stop processing Your Personal Information for any particular purpose or purposes then please contact Us by e-mail at sales@smart-buy.uk.com or by writing to Smart Buy (Helionova Ltd), 19 Frensham Road, Sweet Briar Industrial Estate, Norwich, NR3 2BT.

4. YOUR PERSONAL INFORMATION:

- 4.1 We gather Personal Information such as contact names e-mail addresses postal addresses telephone numbers mobile or otherwise website addresses and any additional comments that You provide voluntarily when You contact Us by e-mail. The web server may also collect data pertaining to every visitor including the IP address the length of time spent on the Site and the pages accessed when visiting the Site
- 4.2 Our main aim in gathering Your Personal Information is to provide You with a customised service
- 4.3 We will process all the Personal Information We collect and hold on You fairly and in accordance with applicable law and We will fully respect Your rights interests and fundamental freedoms with regard to Your Personal Information
- 4.4 We will only collect record process and store Personal Information which is needed to:
 - (a) fulfill Our contractual obligations towards You and Our business partners as may exist from time to time within the Helionova network and/or
 - (b) serve Our legitimate business interests such as administration or marketing or to comply with legal requirements and/or
 - (c) respond to Your e-mailed questions enquiries and requirements that You may have and/or
 - (d) send you information about our goods and/or services marketing information and news relating to new products or improvements or special offers other promotions and offers which we consider may be of interest to you:-
 - a. by electronic means where you purchase goods on-line and do not 'opt out' via tick box or otherwise or where you contact us and 'opt in' via tick box or otherwise to receive the same; and/or
 - b. by non-electronic means that we consider may be of interest to you unless you 'opt out' via tick box or otherwise
- 4.5 We may also use aggregate Personal Information and statistics for the purposes of monitoring Site usage in order to help Us develop the Site and Our Service and may provide such aggregate and anonymised Personal Information to third parties
- 4.6 If You inform Us that you no longer wish Us to contact You for any one or all of the reasons stated above in this clause 4(a) to (e) inclusive then We will cease contacting You although You acknowledge that his may prevent Us from providing this Site or goods to You
- 4.7 If We record or monitor telephone calls to and from You for staff training and quality control purposes We will first inform You that such recording and monitoring is taking place and the related purpose
- 4.8 If at some time in the future We wish to use Your Personal Information in ways other than those set out in this Privacy Policy and requiring Your prior consent then We will notify You about this and seek Your permission to do so

5. SHARING OF PERSONAL INFORMATION:

- 5.1 We may share Personal Information within Helionova's Network together with Our officers employees licensees agents distributors consultants contractors including data processing agencies suppliers and certain selected third party organisations for the sole purpose of fulfilling Our contractual obligations towards You
- 5.2 We will process Your Personal Information in accordance with this Privacy Policy and all current privacy and communications legislation
- 5.3 We will not share Your Personal Information with any third party organisations outside of the Helionova Network without first obtaining Your permission to do so
- 5.4 In all cases any use of Your Personal Information by the Helionova Network which has been instigated by Us will comply with this Privacy Policy
- 5.5 You acknowledge that We reserve the right to use or disclose any Personal Information as needed to satisfy any law regulation or legal request to protect and defend the integrity of the Site including to enforce our [Website Terms and Conditions of Use](#) and [Website Terms and](#)

- 5.6 We may seek Personal Information on your racial or ethnic origins political opinions religious or other beliefs trade-union membership physical or mental health or criminal convictions. If We do collect such Personal Information its use will be limited to Personal Information which is:
 - (a) required to be obtained and retained by law and/or
 - (b) needed for legal proceedings or to establish exercise or defend legal rights including protection against fraud and/or
 - (c) clearly and strictly necessary to fulfil a contract between You and Us
- 5.7 If in the future a third party organisation acquires Us or substantially all of Our assets whether by merger acquisition reorganisation or otherwise You acknowledge and agree that Your Personal Information may well be one of the transferred assets

6. COOKIES:

- 6.1 We may from time to time use Cookies which enable Our own system to recognise You when You visit Our Site to track the pages You looked at while visiting our Site and therefore to improve Our Site and website services to You
- 6.2 A cookie is an alphanumeric identifier which We transfer to Your hard drive through Your web browser when You visit Our Site
- 6.3 Cookies may also be used to compile aggregate Personal Information about the areas of our Site which are visited most frequently. This aggregate Personal Information can be used to enhance the content of our Site and make Your use of it easier
- 6.4 If You wish to remove Our cookie You may configure Your browser to do so. However if You do so You acknowledge that You may not be able to use certain features on our Site
- 6.5 To remove cookies from Your web browser or to obtain further details on cookies including information on persistent and session cookies please go to www.allaboutcookies.org/manage-cookies/ [\[hyperlink\]](#).

7. PROTECTION OF YOUR PERSONAL INFORMATION:

- 7.1 The internet is not a secure medium and We cannot absolutely guarantee the security of Your personal information
- 7.2 We will only provide access to Personal Information on You in circumstances as set out in 5.1 and We have taken appropriate steps to ensure the security of Personal Information whether it is stored in computer systems paper files or other storage media
- 7.3 In particular to ensure that You have peace of mind when using Your credit/debit card over the internet We currently use The Comodo Group to procure Your secure on-line payment for Our Goods (<http://www.comodogroup.com>).
- 7.4 Our Site is protected by certified firewalls in order to protect Your Personal Information from access by unauthorised persons and against unlawful processing
- 7.5 Password protection is provided for all registered users of this Site
- 7.6 All outgoing and incoming email is scanned for viruses
- 7.7 The Helionova Network expects the same high standards of security and confidentiality of any processors agents or sub-contractors We use to process data for Us

8. YOUR RIGHTS - ACCESSING UPDATING AND RETENTION OF PERSONAL INFORMATION:

- 8.1 We will employ effective procedures and safeguards to ensure that the Personal Information We hold on You are adequate relevant and not excessive in relation to the purposes for which they were obtained as well as accurate and up-to-date
- 8.2 You can always access Your Personal Information that We hold about You by logging in and checking and amending/deleting as appropriate Your personal details on screen
- 8.3 If you are unable to access the Personal Information through a personal login where You inform Us of any inaccuracies in the Personal Information We hold We will correct and where appropriate delete incorrect Personal Information
- 8.4 Retention periods are in place to ensure that Personal Information is only stored whilst it is required for the purposes in question or to meet administrative legal or regulatory requirements. Where Personal Information is no longer required We will ensure that they are disposed of in a secure manner
- 8.5 You have the right to see all the Personal Information We hold on You. Should You wish to have access to all or a particular part of Your Personal Information please contact sales@smart-buy.uk.com. Such access will be granted in accordance with the requirements of national legislation and subject to any discretionary allowance for Us to make a charge payable by You to cover Our administration costs incurred in providing You with such Personal Information. Such payment is to be made on application for access to Your Personal Information and is to be no more than the maximum stipulated by national legislation if applicable. The information will be forwarded to You within an appropriate period of time in accordance with national legislation but in any event no more than forty (40) days from the date of such request for access
- 8.6 Where any discrepancies are discovered following Your enquiry We will take immediate steps to validate and where appropriate correct Our records to ensure that Your Personal Information is accurate and kept up-to-date
- 8.7 We will confirm the actions taken in writing to You within an appropriate period of time in accordance with national legislation but in any event no more than 40 days after receiving Your request to amend our records

9. LINKS TO THIRD PARTY WEBSITES:

- 9.1 The Site may from time to time include links to third party internet websites which are controlled and maintained by others
- 9.2 These links are included solely for Your convenience and do not constitute and endorsement by Us of the websites linked or referred to including the products and/or services featured on those websites nor do We have any control over or knowledge of any privacy practices or content of any such websites
- 9.3 We have not reviewed these third party websites and do not make any representations regarding the availability content or accuracy of materials on such websites
- 9.4 If You decide to access third party websites through links on the Site You do so at Your own risk
- 9.5 Your use of third party websites is subject to any privacy policies of those websites which You should read immediately prior to submitting Personal Information to those websites

[Website Terms and Conditions of Use](#) [Website Terms and Conditions of Sale](#)

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