

# Privacy and Security Policy





EcoGenR8 Limited registered at Unit 12 Stratfield Park | Elettra Avenue | Waterlooville | Hampshire | PO7 7XN

Company number 7455556

VAT registration number GB112217371

For more information visit www.ecogenr8.com



## Privacy and Security Policy statement

This Policy applies to all persons working for EcoGenR8 Limited and its trading divisions, AFECO and Innov8 Products (the **Company**) or on its behalf in any capacity, including employees at all levels, directors, agency workers, seconded workers, agents, contractors and suppliers (**workers**).

This Policy takes into account and supports the policies, procedures and requirements documented in the Company's Management Systems, compliant with the requirements of ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018. The implementation and operation of these management systems underlines its commitment to this Policy.

The Company is committed to a policy of protecting the right and privacy of individuals in accordance with the General Data Protection Regulation (**GDPR**) May 2018 and has a dedicated GDPR Policy. This new regulatory environment demands higher transparency and accountability for how Companies manage and use personal data and accords new and stronger rights for individuals to understand and control that use.

This Privacy and Security Policy sets out how the Company collects and processes information from its websites. It is tailored for these applications and is displayed on its websites so that all users are made aware of its commitment, the information it collects and how it is used.





#### Who we are

We are EcoGenR8 Limited (also trading as AFECO) ("us", "we", or "our") and we operate the websites https://www.ecogenr8.com and https://www.afeco.co.uk (the "Service").

## What personal data we collect and why we collect it

#### Comments

When visitors leave comments on the site we collect the data shown in the comments form, and also the visitor's IP address and browser user agent string to help spam detection.

An anonymised string created from your email address (also called a hash) may be provided to the Gravatar service to see if you are using it. The Gravatar service privacy policy is available here: https://automattic.com/privacy/. After approval of your comment, your profile picture is visible to the public in the context of your comment.

#### Media

If you upload images to the website, you should avoid uploading images with embedded location data (EXIF GPS) included. Visitors to the website can download and extract any location data from images on the website.

#### **Contact forms**

When submitting a contact form, you agree that you are voluntarily supplying us with the information requested on that form. This data is used to provide you with information and/or services you requested. The form is emailed to us, and entries are not stored in the database at this time.

#### Cookies

If you leave a comment on our site you may opt-in to saving your name, email address and website in cookies. These are for your convenience so that you do not have to fill in your details again when you leave another comment. These cookies will last for one year.





If you have an account and you log in to this site, we will set a temporary cookie to determine if your browser accepts cookies. This cookie contains no personal data and is discarded when you close your browser.

When you log in, we will also set up several cookies to save your login information and your screen display choices. Login cookies last for two days, and screen options cookies last for a year. If you select "Remember Me", your login will persist for two weeks. If you log out of your account, the login cookies will be removed.

If you edit or publish an article, an additional cookie will be saved in your browser. This cookie includes no personal data and simply indicates the post ID of the article you just edited. It expires after 1 day.

#### **Embedded content from other websites**

Articles on this site may include embedded content (e.g. videos, images, articles, etc.). Embedded content from other websites behaves in the exact same way as if the visitor has visited the other website.

These websites may collect data about you, use cookies, embed additional thirdparty tracking, and monitor your interaction with that embedded content, including tracing your interaction with the embedded content if you have an account and are logged in to that website.

### Analytics

We use Google Analytics. IP addresses are anonymized. You may also ask us not to track your browsing and/or opt out of Google Analytics altogether.

## Who we share your data with

The bottom line is that we will not sell, rent, or otherwise disclose any personal information about you, except under very specific conditions. We do cooperate with government and law enforcement officials to enforce and comply with the law. We will disclose any information about Users upon valid request by government or law officials, including without limitation:

Subpoenas;





- To protect your property and rights, or the property and rights of a third party;
- To protect the safety of the public or any person; or
- Stop activity we consider illegal or unethical.

## How long we retain your data

If you leave a comment, the comment and its metadata are retained indefinitely. This is so we can recognise and approve any follow-up comments automatically instead of holding them in a moderation queue.

For users that register on our website (if any), we also store the personal information they provide in their user profile. All users can see, edit, or delete their personal information at any time (except they cannot change their username). Website administrators can also see and edit that information.

You will be able to unsubscribe from any communications from us, and your subscription data will be deleted.

## What rights we have over your data

If you have an account on this site, or have left comments, you can request to receive an exported file of the personal data we hold about you, including any data you have provided to us. You can also request that we erase any personal data we hold about you. This does not include any data we are obliged to keep for administrative, legal, or security purposes.

## Where we send your data

Visitor comments may be checked through an automated spam detection service.





## Your contact information

Our site is secured via SSI using 2048-bit encryption. Your contact information, if you have registered on the site, is stored in a database on the server. If you use our contact form, it is emailed securely to an administrator. You may contact us with any privacy-specific concerns at info@ecogenr8.com.

## Additional information

#### How we protect your data

We protect your data in the following ways:

- We use 2048-bit SSL encryption;
- We anonymize IP addresses;
- We support 'Do Not Track' & user opt-out of Google Analytics.

#### What data breach procedures we have in place

We have a written GDPR compliance policy which includes details on how we deal with any data breaches. You can view our GDPR Policy here.

#### What third parties we receive data from

We do not receive data from third parties.

## What automated decision making and/or profiling we do with user data

Our server keeps log files of those who visit the site, including their IP address. This is for security purposes, including login failures and spam detection. These log files are overwritten at various times, resulting in deletion of the data in previous logs.





## **Compliance and Review**

This Policy will be updated as necessary to reflect best practise in data management, security and control and to ensure compliance with any changes or amendments to the GDPR and other relevant legislation.

This Policy applies to EcoGenR8 Limited and its trading divisions, AFECO and Innov8 Products. It is reviewed for each financial year.

This Policy relates to the 2020 / 2021 financial year.

I take full responsibility for ensuring the policy is implemented.

Approved by A. Field Director November 2020





