

# Privacy and Cookie Policy

Document owner:

Control authority: Management Team

## Change log

Version	Date	Changed by	Reviewer	Comments/Updates
0.1	14 Nov 2023	Tracy Hannon-Jones	Richard Sunderland	Created
1.0	16 Nov 2023	Richard Sunderland	Sam Denyer	Released
2.0	12 Jan 2024	Zoe Kenworthy	Richard Sunderland	Updated with new website cookies and d

## Scope

This Privacy Policy applies between you, the User of this Website, and Kirontech UK Ltd, the owner and provider of this Website. Kirontech UK Ltd, takes the privacy of your information very seriously. This Privacy Policy applies to our use of all data collected by us or provided by you in relation to your use of the Website.

## Please read this Privacy Policy.

### Definitions and Interpretations

In this Privacy Policy, the following definitions are used:

*Data:*

Collectively all information that you submit to Kirontech UK Ltd via the Website. This definition incorporates, where applicable, the definition provided in the Data Protection Laws (the GDPR/Data Protection Act 2018);

*Cookies:*

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 the clause below (Cookies);

*Data Protection Laws:*

Any applicable law relating to the processing of personal Data, including but not limited to the GDPR, and any national implementing and supplementary laws, regulations, and secondary legislations;

*GDPR:*

The UK General Data Protection Regulation / Data Protection Act 2018;

*Kirontech, we or us:*

Kirontech UK Ltd, a company incorporated in England and Wales, with the registered number 09540297 whose registered office is at 4 Wellington Court, Wellington Street, Cambridge, Cambridgeshire, England, CB1 1HZ.

*UK and EU Cookie Law:*

The Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended by the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011 & the Privacy and Electronic Communications (EC Directive) (Amendments) Regulations 2018;

*User:*

Any third party that accesses the Website and is not either (1) employed by Kirontech UK Ltd, and acting in the course of their employment or (2) engaged as a consultant or otherwise providing services to Kirontech UK Ltd and accessing the Website in connection with the provision of such services;

*Website:*

The website that you are currently using, [www.kirontech.com](http://www.kirontech.com) and any sub-domains of this site unless expressly excluded by their own terms and conditions.

## About this Privacy Policy

In this Privacy Policy, unless the context requires a different interpretation:

- The singular includes the plural and vice versa.
- A reference to a person includes firms, companies, government entities, trusts, and partnerships.
- “including” is understood to mean “including without limitation.”
- Reference to any statutory provision includes any modification or amendment of it.

## Scope of this Privacy Policy

This Privacy Policy applies to the actions of Kirontech UK 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.

For purposes of the applicable Data Protection Laws, Kirontech UK Ltd is the “data controller.” This means that Kirontech UK Ltd determines the purposes for which, and the manner in which, your data is processed.

## Data Collected

We may collect the following data, which includes personal data, from you:

- Name
- Contact information such as email addresses and telephone numbers.
- IP address (automatically collected)
- Web browser type and version (automatically collected)

In each case. In accordance with this Privacy Policy.

## How we collect data

We collect data in the following ways.

- Data is given to us by you, and.

- Data is collected automatically.

## **Data That is Given to Us by You**

Kirontech UK Ltd will collect your data in a number of ways, for example:

- When you contact us through this Website, by telephone, email or through any other means.
- When you elect to receive marketing communications from us.

In each case, in accordance with this Privacy Policy.

## **Data That is Collected Automatically**

To the extent that you access the Website, we will collect your data automatically, for example:

We will 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, the frequency with which you access the Website and the way you use and interact with its content.

We will collect your data automatically via cookies, in line with the cookie settings on your browser. For more information about cookies, and how we use them on the Website, see the section below, headed 'Cookies.'

## **Our Use of Data**

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:

- Recruitment
- Monitor SUsage
- Track Engagement
- Contacting Us

In each case, in accordance with this Privacy Policy.

We may use your data for the above purposes if we deem it necessary to do so for our legitimate interests. If you are not satisfied with this, you have the right to object in certain circumstances (see the section headed “Your Rights” below).

## Who We Share Data with:

We may share your data with the following groups of people for the following reasons:

- Our employees, agents and/or professional advisors to support your application for employment.
- Our employees, agents and/or professional advisors to support your sales/contact enquiry.

In each case, in accordance with this Privacy Policy.

## Data Retention

Unless a longer retention period is required or permitted by law, we will only hold your data on your systems for the period necessary to fulfil the purposes outlined in the Privacy Policy or until you request that the data be deleted.

Even if we delete your data, it may persist on backup or archival media for legal, tax or regulatory purposes.

## Your Rights

You have the following rights in relation to your Data:

- 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 reason(s) why.
- Right to correct – you have the right to have your data rectified if it is inaccurate or incomplete.
- Right to erase - you have the right to request that we delete or remove your data from our systems.
- 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.
- Right to data portability – the right to request that we move, copy or transfer your data.

- Right to object – the right to object to our use of your data including where we use it for our legitimate purposes.

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: [dpo@kirontech.com](mailto:dpo@kirontech.com)

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 webpage at: <https://www.ico.org.uk/>

It is important that the data we hold about you is accurate and current. Please keep us informed if your data changes during the period for which we hold it.

## **Links to Other Websites**

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. The 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.

## **Changes to Business Ownership and Control**

Kirontech UK Ltd may from time to time, expand or reduce our business at any time and this may involve the sale and/or the transfer of all or part of Kirontech UK Ltd. Data provided by Users will, where it is relevant to any part of our business so transferred, be transferred along with the 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.

We may also disclose data to a prospective purchaser of our business or any part of it.

In the above instances, we will take steps with the aim of ensuring your privacy is protected.

## **Cookies**

This Website may place and access certain Cookies on your computer. Kirontech UK Ltd uses Cookies to improve your experience of using the Website and to improve our range of services.

Kirontech UK Ltd has carefully chosen these Cookies and has taken steps to ensure that your privacy is protected and respected at all times.

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

This Website may place the following Cookies:

*Strictly necessary cookies:*

There are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website

*Analytical/Performance cookies:*

They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

*Functionality cookies:*

These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example: your choice of language or region). By using the Website, you agree to our placement of functionality cookies.

*Targeting cookies*

These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose

You can find a list of Cookies that we use in the Cookies Schedule.

You can choose to enable or disable Cookies in your internet browser. You can switch off Cookies at any time, however, you may lose information that enables you to access the Website more quickly and efficiently.

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

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.

For more information generally on cookies, including how to disable them, please refer to [aboutcookies.org](http://aboutcookies.org). You will also find details on how to delete cookies from your computer.

## **General**

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.

If any court or competent authority finds that any provision of the 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.

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.

This Agreement will be governed by and interpreted in accordance to the law of England and Wales. All disputes under the Agreement will be subject to the exclusive jurisdiction of the English and Welsh courts.

## **Changes to the Privacy Policy**

Kirontech UK Ltd 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 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 Kirontech UK Ltd by email: [dpo@kirontech.com](mailto:dpo@kirontech.com)



# Cookies Schedule

Cookie	Type	Name	Expiration	First or Third Party	Purpose
_ga	Analytics	Google.com. gtag.js	2 years	First and 3 <sup>rd</sup> party	Used to distinguish users
_ga_<container-id>	Analytics	Google.com. gtag.js	2 years	First and 3 <sup>rd</sup> party	Used to persist session state.
nitroCachedPage	Strictly Essential	Nitropack	Session	First and 3 <sup>rd</sup> party	speeds up page delivery.
_grecaptcha	functional	Google reCAPTCHA	6 months	Third Party	To speed up spam protection.
	Targeting	LinkedIn Insights Tag		First-party cookie	Track conversations, retarget website visitors, and unlock additional insights about members interacting with our ads.
E globals	Functional	Elementor	Session		To provide functionality across pages, store configuration.