

Firewood respects your privacy and is committed to protecting your personal data. This privacy policy ("Policy") aims to give you information on how we collect, hold and process your personal data, including but not limited to any data you may provide when you sign up to our newsletter or enquire about or purchase our products and services, and any data you may provide through our websites at <https://www.firewoodltd.com> (including through our FAST™ software platform at <https://fast.firewoodtools.com>) (collectively our "Site").

We will only collect and use personal data in ways that are described here, and in a manner that is consistent with our obligations and your rights under the law.

It is important that you read this privacy policy together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

If you are using our Site, your acceptance of this privacy policy is deemed to occur upon your first use of the Site and you will be required to read and accept this Policy when signing up for an account.

## 1. Who We Are

Our Site is operated by Firewood, a limited company registered in England under company number 04915905, whose registered address is at International House, 36-38 Cornhill, London EC3V 3NG ("we/us/our"). Our VAT number is 923 3243 49. Our Data Protection Officer is Tayyab Jamil and they can be contacted at [info@firewoodltd.com](mailto:info@firewoodltd.com), International House, 36-38 Cornhill, London EC3V 3NG.

## 2. What This Policy Covers

Personal data, or personal information, means any information about a living individual from which that person can be identified (directly or indirectly). This definition shall, where applicable, incorporate the definitions provided in the UK Data Protection Act 2018, also known as the UK's implementation of the General Data Protection Regulation ("GDPR"). Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers. It does not include data where the identity has been removed (anonymous data).

Our Site may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. We encourage you to read the privacy policy of every website you visit before submitting any personal data to third parties.

## 3. Your Rights

As a data subject, you have the following rights under the GDPR, which this Policy and our use of personal data have been designed to uphold:

- The right to be informed about our collection and use of your personal data;
- The right of access to the personal data we hold about you (see section 10);
- The right to rectification if any personal data we hold about you is inaccurate or incomplete (please contact us using the details in section 13);
- The right to be forgotten – i.e. the right to ask us to delete any personal data we hold about you; (We only hold your personal data for a limited time, as explained in section 5 but if you would like us to delete it sooner, please contact us using the details in section 13);
- The right to restrict (i.e. prevent) the processing of your personal data;
- The right to data portability (obtaining a copy of your personal data, which is processed using automated means, to re-use with another service or organisation);
- The right to object to us using your personal data for particular purposes; and
- Rights with respect to automated decision making and profiling. (We do not use your personal data in this way.)

If you require any information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in section 13.

Further information about your rights can also be obtained from the UK's supervisory authority, Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, please contact us using the details provided in section 13 and we will do our best to solve the problem for you.

If we are unable to help, you also have the right to lodge a complaint with the Information Commissioner's Office. We would, however, appreciate the chance to deal with your concerns before you approach the Information Commissioner's Office, so please contact us in the first instance.

## 4. What Personal Data Do We Collect?

Depending upon your use of our Site and/or our products and services, we may collect, use, store and transfer some or all of the following personal data:

- Name
- Business/company name
- Email address
- Phone number
- Country, region, city and office location
- Job title, position, level
- User name / password

Personal data forming part of reviews and reference material submitted to us. Transaction Data, including details about payments to and from you and other details of products and services you have purchased from us;

Technical Data, including internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our Site; Profile Data, including purchases or orders made by you, your preferences, feedback and survey responses; Usage Data, including information about how you use our Site, products and services;

Marketing and Communications Data, including your preferences in receiving marketing from us and our third parties and your communication preferences; and

Data from third parties or publicly available sources. We may receive personal data about you from various third parties, such as Google based outside the EU.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with products or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

## 5. How Do We Use Your Data?

All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means,

and the applicable legal requirements.

Our use of your personal data will always have a lawful basis, either because it is necessary for our performance of a contract with you, because you have consented to our use of your personal data (e.g. by subscribing to emails), or because it is in our legitimate business interests to use it. Please contact us (using the details provided in section 13) if you need details about the specific legal ground we are relying on to process your personal data.

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us (see section 13 below).

## 6. Specifically, We May Use Your Data for the Following Purposes:

- Providing and managing your account
- Providing and managing your access to our Site
- Supplying our products and services to you
- Personalising and tailoring our products and services for you
- Communicating with you (e.g. responding to emails or calls from you)
- Supplying you with emails that you have opted into (you may unsubscribe or opt-out at any time by clicking on the unsubscribe link in the relevant communication)
- Market research
- Enforcing our contracts and policies, investigating complaints and preventing illegal activity
- Complying with our legal obligations
- Analysing your use of our Site and gathering feedback to enable us to continually improve our Site and your user experience
- Logging data to allow system auditing
- Supporting network and system security
- Conducting web analytics.

With your permission and/or where permitted by law, we may also use your data for marketing purposes which may include contacting you by email with information, news and offers on our products and services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that we fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003. We will get your express opt-in consent before we share your personal data with any third parties for marketing purposes.

You have the right to withdraw your consent to us using your personal data at any time, and to request that we delete it. Where you opt out of receiving marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, product/service experience or other transactions (i.e. service emails).

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us (see section 13 below). If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

## 7. How and Where Do We Store Your Data?

We only keep your personal data for as long as we need to in order to use it as described above in section 5, and/or for as long as we have your permission to keep it.

Some of the external third parties to whom we transfer your personal data are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries.
- Where we use certain service providers, we may use standard contractual clauses ('SCCs') approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.
- Where we use providers based in the US, we will make an assessment to determine whether we can transfer your personal data on the basis of SCCs taking into account the circumstances of the transfer, and put supplementary measures in place if required. The supplementary measures along with SCCs follow a case-by-case analysis of the circumstances surrounding the transfer and this would ensure that U.S. law does not encroach on the satisfactory level of protection guarantee. If we come to the decision, taking into account the circumstances of the transfer and possible supplementary measures, that appropriate safeguards would not be ensured, then we will either suspend the transfer of your personal data until we ensure an adequate level of protection can be provided or we might end the transfer of your personal data.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

Data security is very important to us, and to protect your data we have taken suitable security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. For example, FAST™ authentication uses BCrypt algorithm for secure password storage and the communication between the server and client is secured by HTTPS.

In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 8. Do We Share Your Data?

Subject to the sections below, we will not share any of your data with any third parties for any purposes.

We may sometimes contract with third parties to supply products and services to you on our behalf. These may include payment processing, search engine facilities, and marketing. In some cases, the third parties may require access to some or all of your data:

- We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions and the law.
- We may compile statistics about the use of our Site including data on traffic, usage patterns, user numbers, sales, and other information. All such data will be anonymised and will not include any personally identifying data, or any anonymised data that can be combined with other data and used to identify you. We may from time to time share such data with third parties such as prospective investors, affiliates, partners, and advertisers. Data will only be shared and used within the bounds of the law.
- We may sometimes use third party data processors that are located outside of the EEA. Where we transfer any personal data outside the EEA, we will take all reasonable

steps to ensure that your data is treated as safely and securely as it would be within the UK. The third-party data processor used by us is Zoho Analytics for dashboards and reporting visuals.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

## 9. What Happens If Our Business Changes Hand?

We 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 our business.

Any personal data that you have provided will, where it is relevant to any part of our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this privacy policy, be permitted to use that data only for the same purposes for which it was originally collected by us.

## 10. Subject Access Requests

You have the right to ask for a copy of any of your personal data held by us about you. Please contact us for more details using the contact details below in section 13.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive (to cover our administrative costs in responding). Alternatively, we could refuse to comply with your request in these circumstances.

Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## 11. Cookies

Cookies are small text files placed on your computer or device by our Site when you visit certain parts of our Site and/or when you use certain features of our Site. Our Site may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by us and are used only by us. We use Cookies to facilitate and improve your experience of our Site and to provide and improve our products and services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.

'Session cookies' allow us to track your actions during a single browsing session, but they do not remain on your device afterwards. 'Persistent cookies' remain on your device between sessions. We use them to authenticate you and to remember your preferences. We can also use them to balance the load on our servers and improve your experience on our Site.

By using our Site you may also receive certain third party Cookies on your computer or device. Third party Cookies are those placed by websites, services, and/or parties other than us. These Cookies are not integral to the functioning of our Site and your use and experience of our Site will not be impaired by refusing consent to them.

All Cookies used by and on our Site are used in accordance with current cookie law (meaning the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003).

Before Cookies are placed on your computer or device, you will be shown a pop-up message requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling us 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 our Site may not function fully or as intended.

Website analytics refers to a set of tools used to collect and analyse anonymous usage information,

enabling us to better understand how our Site is used. This, in turn, enables us to improve our Site and the products and services offered through it.

You do not have to allow us to use these Cookies, however whilst our use of them does not pose any risk to your privacy or your safe use of our Site, it does enable us to continually improve our Site, making it a better and more useful experience for you.

In addition to the controls that we provide, 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 or the documentation that came with your device.

You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access our Site more quickly and efficiently including, but not limited to, login and personalisation settings.

It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

## 12. Changes to Our Privacy Policy

We may change this privacy policy from time to time (for example, if the law changes or if we change our business in a way that affects personal data protection). It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## 13. Contacting Us

If you have any questions about this privacy policy, please email us at: [info@firewoodltd.com](mailto:info@firewoodltd.com)

Or write to us at:  
Firewood  
International House  
36-38 Cornhill  
London EC3V 3NG

Please ensure that your query is clear, particularly if it is a request for information about the data we hold about you.