

PRIVACY POLICY

Lowergy Limited processing of personal data

Purpose

Lowergy Limited (hereinafter "Lowergy") safeguard your personal privacy and we want to do our utmost to make you feel secure about how your personal data is processed with us. Therefore, we have established this policy. It is based on current data protection legislation and clarifies how we work to protect your rights and your privacy. The purpose of this policy is to let you know how we process your personal data, what we use it for, who can access it and under what conditions, and how you can exercise your rights.

Background

We process your personal information primarily to fulfil our obligations to you. Our starting point is not to process more personal information than is necessary and we always strive to use the least privacy-sensitive information. We also need your personal information to provide you with good service, for example in terms of marketing, monitoring and information. We may also need your personal information to comply with laws and to perform customer and market analyses. You have the right to oppose us using personal data for direct marketing purposes.

In the following sections you will find information about what information about you we process, for what purposes, the legal basis for the processing, how long the data is stored and your rights, etc.

What information do we process and why?

We process your information for many different purposes, but above all we do this in order to offer our products and services, to communicate with you about the customer relationship, to send notifications and to ensure that your information is up to date and accurate. We also process your information in order to handle requests from you, e.g. about us and our products and services in different channels and to handle customer service matters. We also want to be able to offer, develop and improve our services and products and create really attractive offers for our customers. In line with this, we may process your data with the aim of conducting customer analyses at a general level, eg. to develop business methods, analysis models, customer and business strategies, and with the aim of producing reports and statistics for monitoring and evaluating our operations. To ensure all this, we process your personal information, but it is important that you know that you are not obliged to submit your information to us, but if you do not, we may not be able to offer you our products and services in full. .

Below you will find explanations for the categories of data we collect and the legal basis for the processing.

Information	Legal basis for the processing
<i>Identity information</i> , name, company name	The treatment is necessary to fulfil our customer agreement with you and/or your company and to satisfy our legitimate interest in following up and evaluating our business as well as communicating personal and relevant information and offers to you.
<i>Contacting details</i> , e-mail address, address and, where applicable, the company's organization number	
<i>Customer engagement</i> , e.g. information on what products and services you or the company have bought	We also need some information to fulfil our legal obligations to the HM Revenue & Customs in the UK and other authorities, e.g. when we do our accounting.

How do we access personal data?

We may access certain personal and company data by providing us this information yourself. We also access your personal and company data in the following ways:

- Public records
- You participate in one of our customer events
- You sign up for newsletters and other mail outs
- You respond to surveys and inquiries
- You contact us, visit us or otherwise contact us

How is this information shared?

Our basis is not to disclose your personal data to third parties unless you have consented to it, or if it is not necessary to fulfil our obligations under contract or law. In cases where we disclose personal data to third parties, we establish confidentiality agreements and ensure that personal data is processed in a satisfactory manner. Please note however that we may, by law, have to share information with the Police when investigating crimes.

All personal data processing will take place in the UK as a general rule and in cases where personal data is disclosed to customers outside the EU/EEA, Lowergy ensures that any of the exceptions to the prohibition on transfer to third countries can be applied, for example consent, standard contract clauses or adherence to Privacy Shield to achieve adequate protection.

How long and how secure is the data stored?

We delete your personal data once it is no longer relevant or necessary to us or e.g., when you request correction or deletion of the information. At that point in time, an information is no longer relevant to us or if we no longer have a legal basis to process these data, this information will be deleted or de-identified as soon as possible and no later than 12 months from that date. We have chosen to work only with IT systems that have achieved a high security standard internationally, who continuously work to improve their built-in security and who, in the same way as we do their utmost, to comply with the requirements of the Data Protection Regulation. Furthermore, our security systems are developed with your integrity in focus and to a very high degree protect against intrusion, destruction and other changes that may pose a risk to your privacy. In addition, we have developed internal procedures and working methods to ensure that your personal data is handled in a secure manner. As an example, we strive to give access only to employees and other individuals within the organization who need the personal data to perform their tasks.

What rights do you have that get registered?

The Data Protection Regulation gives you a number of rights in relation to the processing of your personal data. We process your personal data to the extent necessary to fulfil your rights.

Access to your personal data

You have the right to request a confirmation from us if we process personal data relating to you, and in such case request access to the personal data we process about you, a so-called register extract.

Request correction

Furthermore, if you believe that information about you is incorrect or incomplete, you have the right to request that the information to be corrected.

Revoke consent with future effect

To the extent that we process your personal data with the support of your consent, you have the right at any time to revoke your consent to the processing with future effect. This means that if you revoke your consent, we have the right to continue processing personal data already collected with the support of your previous consent.

Oppose you treatment for direct marketing purposes

You also have the right, at any time, to oppose our processing of your personal data for direct marketing purposes and to deregister from continued mail outs by reporting this to us, e.g. by clicking on a unsubscribe link in the mailing or contact customer service.

Oppose you treatment that relies on our legitimate interest

You have the right to oppose treatments that rely on a legitimate interest that we have if you have personal reasons related to the situation. However, we may continue to process your data, even though you have opposed the processing, if we have compelling justifiable reasons for the processing that transcend the privacy interest.

Deletion

In some circumstances, you have the right to have your personal data deleted. However, this does not apply if, for example, we are required by law to preserve the information.

Limitation of treatment

You also have the right to request that the processing of your personal data be restricted. However, requesting that your data processing be restricted may result in us not being able to fulfil our possible obligations to you during the time the processing is limited.

Data portability

Finally, you have the right to get a copy of the personal data that involves you in a structured format (data portability). The right to data portability, as opposed to the right to register extracts, only covers information that you yourself have provided to us and that we process with the support of certain legal grounds, e.g. an agreement with you.

Who is responsible for personal data?

Lowergy Limited (Comp. no 319660), Broombank, North Connel, Oban, Argyll, PA37 1RD, is responsible for personal data and responsible for this privacy policy. If you have any questions or otherwise want to get in touch with us, you are welcome to visit our website <https://www.lowergy.com/> or email us at info@lowergy.com. Please note that we may display third-party ads and other content that links to third-party websites. We cannot control or be held responsible for third party handling of personal data and content.

Changes and additions to the privacy policy

The privacy policy may change from time to time, so we recommend that you visit our website regularly to take part of the latest version.