

# PRIVACY POLICY

**LOWERGY LIMITED** (Comp. no SC319660), is committed to protecting and respecting your privacy.

This Global Privacy Policy, together with our Terms and Conditions, our Data Protection Letter (if applicable) and any other documents referred to in any of the aforementioned (together the “**Policy**”) describes the types of personal information we collect, how we use the information, with whom we share it, how you can exercise your rights on your personal data and the choices you can make about our use of the information. We also describe the measures we take to protect the security of the information and how you can contact us about our privacy practices. In some cases, and where applicable, we may ask you to sign a separate form of letter (“**Data Protection Letter**”) to indicate your explicit consent to our processing of your personal data for the purposes set out in the Policy. However, please note that the absence of (i) such a request, or (ii) a Data Protection Letter signed by you, is not intended to be conclusive of this issue and we shall be entitled to conclude that, by visiting us at any of our approved web sites; applications; or Portals, or using our other digital assets or agreeing to receive Services from us, you are accepting and consenting to the practices described in the Policy. Notwithstanding this, you have the right to contact us to object to, or make certain requests in relation to, the processing of your personal data (as explained further in the **Your Rights** section of this policy).

Our privacy practices may vary among the countries in which we operate to reflect local practices and legal requirements (“**Applicable Data Protection Laws**”). In most cases this will be the law of the country in which you are located.

According to Applicable Data Protection Laws, you may be entitled to know the identity of your “Data Controller” i.e. the legal entity which determines why and how your personal data is processed.

Your relevant Data Controller may vary, depending on how you are receiving services from us. For example:

1. **Corporate Clients Direct Consumers / Individuals /:** LOWERGY as a “Data Processor” within the meaning of Applicable Data Protection Laws, will process any personal data under the Data Controller’s sole instructions, and will take all steps necessary to preserve the security and confidentiality of the personal data, and prevent their alteration, damage, or access by unauthorized persons.
2. **Referred / Partners:** If you normally deal with one of our business affiliates or associated companies but have been referred to us to receive specific services at the bequest of that business partner, then that business partner may be your relevant Data Controller. In such case, this Policy may not apply to you and please refer, instead, to that business partner’s privacy policy. Even if this Policy does not directly apply to you, LOWERGY as a Data Processor, will process the personal data under the Data Controller’s sole instructions, and will take all steps necessary to preserve the security and the confidentiality of the personal data, and prevent their alteration, damage, or access by unauthorized persons.

If you have any questions in regard to the above, please contact us at [info@lowergy.com](mailto:info@lowergy.com) or using the details set out in the Contact page

## **Information we collect from you**

If you’ve selected “No” to us being able to store and use your data, please note once we’ve dealt with your enquiry and there is no further legitimate interest, we will delete any personal data shared. Please note we will not use any personal information provided for the purposes of remarketing or sell to any 3rd party.

We may collect personal information (including personally identifiable information or, where relevant, sensitive personal data within the meaning of Applicable Data Protection Law) about you and/or your family (“**Your Data**”) in the following ways:

- **Information you give us.** This is information that you give us by filling in forms on our websites or other digital assets or by corresponding with us by phone, email or otherwise. This includes when you use our websites or other digital assets or inquire about services. The information may include without limitation your name, address, e-

mail address, phone number or other contact details, occupation, role/title/area of responsibilities.

- While we make every effort to ensure that Your Data is accurate, complete and up to date, you can help us considerably in this by promptly notifying us if there are any changes to Your Data (please see the **How to Contact Us** section. We do not collect or process any sensitive data without obtaining your prior explicit consent.
- **Information we collect about you.** We, our service providers and other business partners may collect certain information by using automated means, such as cookies, when you interact with our advertisements, mobile applications, or visit our websites, pages or other digital assets. This information may include your IP address, browser type, operating system, the full URLs, referring URLs and information on actions taken or interaction with our digital assets. We may use third-party web analytics services on our websites and other digital assets, to help us analyse how visitors use our websites and other digital assets. We, our service providers and our business partners may also collect information about your activities on our websites and other digital assets for use in providing you with content and advertising tailored to your individual interests. The information collected for these purposes may include details about things like the particular pages or advertisements you view on our websites and the actions you take on our websites and or other digital assets. For more details, please see our Cookie Policy below.

### **Use of Your Data**

We may use Your Data in the following ways:

- to provide you with information regarding our services by post, telephone, email etc.;
- to notify you about changes to the Services;
- to operate, evaluate and improve our business (including developing new products and services, troubleshooting, data analysis, testing and research and statistical and survey purposes); managing our communications; determining the effectiveness of and optimizing our advertising; analysing our products, services, websites, mobile applications and any other digital assets; facilitating the functionality of our website, mobile applications and any other digital assets; to ensure the content of our site is presented in the most effective manner for you and for your computer; and performing accounting, auditing, billing, reconciliation and collection activities;
- as may be required by applicable laws and regulations or requested by any relevant judicial process or governmental agency; and
- to comply with industry standards and our policies.

### **Disclosure of Your Data We may share Your Data with:**

- Any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006, subject to the terms of this Global Privacy Policy.
- Business partners, suppliers and sub-contractors for the performance of the Services (as applicable) or any other contract we enter into with them or you.

### **We may also disclose Your Data to third parties:**

- In the event that we sell or buy any business or assets, in which case we may disclose Your Data to the prospective seller or buyer of such business or assets.
- If Lowergy Ltd or substantially all of its assets are acquired by a third party, in which case Your Data may be one of the transferred assets.
- If we are under a duty to disclose or share Your Data in order to comply with any legal obligation, or in order to enforce or apply our Terms of Use or Terms and Conditions and other agreements; or to protect the rights, property, or safety of our group, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and risk reduction.

As the case may be, one or more of the above may be located outside of the United Kingdom.

## **Storage and transfer of Your Data**

The security of Your Data is important to us. We are committed to protecting the information we collect. We maintain administrative, technical and physical safeguards designed to protect the personal information you provide, or we collect against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use. All information you provide to us is stored on our dedicated managed server behind a firewall. We use SSL encryption on our website from which we may transfer certain personal information. Any passwords are stored using salted and hashed encryption for additional security.

We store Your Data only for as long as it is necessary to fulfil the purpose for which it was collected, unless otherwise required or authorized by Applicable Data Protection Law. We take measures to destroy or permanently de-identify Your Data if required by law or if Your Data is no longer required for the purpose for which we collected it.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website or other digital assets, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect Your Data, we cannot guarantee the security of Your Data transmitted to our websites or other digital assets that are in the public domain; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

## **Your rights**

Under Applicable Data Protection Law, you may have certain rights regarding the personal information we maintain about you. We also offer you certain choices about what personal information we collect from you, how we use that information, and how we communicate with you.

You can choose not to provide personal information to us. You also may refrain from submitting information directly to us. However, if you do not provide Your Data when requested, or if you exercise your rights you may not be able to benefit from the Services (as applicable), and we may not be able to provide you with information about our products, services and promotions.

To the extent provided by Applicable Data Protection Law, you may withdraw any consent you previously provided to us, or object at any time to the processing of Your Data. We will apply your preferences going forward. In some circumstances, withdrawing your consent to our use or disclosure of Your Data will mean that you cannot take advantage of certain Services.

In addition you may have the right to: obtain confirmation that we hold personal information about you, request access to and receive information about the personal information we maintain about you, receive copies of the personal information we maintain about you, update and correct inaccuracies in your personal information, object to the processing of your personal information, and have the information blocked, anonymized or deleted, as appropriate. The right to access personal information may be limited in some circumstances by local law requirements including Applicable Data Protection Law. To exercise these rights, please contact.

You have the right to ask us not to process Your Data for marketing purposes. We will inform you (before collecting Your Data) and obtain your prior consent where required by the Applicable Data Protection Law if we intend to use Your Data for such purposes or if we intend to disclose Your Data to any third party for such purposes. You can exercise your right to prevent such processing by advising us of your preferences before we collect Your Data, including on the form that is used to collect Your Data. You can also exercise the right at any time by contacting us at [lowergy.com](mailto:lowergy.com)

The rights above are likely to apply to you if you are based in Europe.

Our website or other digital assets may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

If you provide us with any information or material relating to another individual, you should make sure that the sharing with us and our further use as described to you from time to time is

in line with applicable laws, so for example you should duly inform that individual on the processing of her/his personal data and obtain her/his consent, as may be necessary under Applicable Data Protection Laws.

### **Access to information**

Applicable Data Protection Law may give you the right to access information held about you. This will usually be the case where you are based in Europe. Any access request may be subject to a fee, where permitted under Applicable Data Protection Law. Any request should be made in writing, and the best way for you to do so is to contact us at the address stated below. As we must be able to identify the person making the request, and because a fee may be due, we request that you confirm any request made by you via different means by contacting us at the address stated below. Due to technological constraints and/or information security considerations, it may be inappropriate to use social media to supply information in response to any request by you for access to information, and so please provide an alternative delivery address for our response. We may reject requests where we are entitled to do so under Applicable Data Protection Laws, which may include where the request is manifestly unreasonable, in particular due to its repetitive or systematic nature, require disproportionate effort and/or risks the privacy or confidentiality of others.

### **Data Security and Integrity**

The security, integrity and confidentiality of Your Data is very important to us. We have implemented controls to protect Your Data from unauthorised access, modification, disclosure and misuse. We encrypt our data in transit and constantly review new technologies to protect Your Data. Please bear in mind that despite our best efforts to safeguard Your Data, no security measures are perfect or impenetrable.

### **Changes to our Global Privacy Policy**

Any changes we make to our Global Privacy Policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our Global Privacy Policy.

### **How to contact us**

If you have any questions or comments about this Global Privacy Policy, our privacy practices or if you would like us to update information or preferences you provided to us, please e-mail us at: [info@lowergy.com](mailto:info@lowergy.com)

or write to us at:

Lowergy Limited

Data Protection Officer: Bengt Selvert

Broombank, North Connel

Oban, Argyll, PA37 1RD

Scotland

### **Cookies**

#### **What are Cookies?**

Cookies are small text files stored on your device when you access our website. They are used to remember your preferences, improve user experience, and provide us with analytical data.

#### **Types of Cookies Used**

**Essential Cookies:** Necessary for the functioning of our website, enabling basic features like page navigation and access to secure areas of the website.

**Performance Cookies:** These cookies collect information about how you use our website, like pages visited and any errors encountered. This helps us improve the performance of our site.

**Functionality Cookies:** These are used to remember your preferences (such as language or region) and provide enhanced, more personalized features.

**Analytics Cookies:** We use these cookies to analyse user interaction with our website. This helps us provide a better user experience and improve our services.

**Targeting/Advertising Cookies:** These cookies are used to deliver adverts more relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of the advertising campaign.

#### **Managing and Deleting Cookies**

**Browser Settings:** Most web browsers allow some control of most cookies through the browser settings. You can adjust your browser settings to decline cookies or alert you when a website is attempting to place a cookie on your device.

**Cookie Preferences:** You can manage your preferences on our website to accept or reject certain categories of cookies.

**Opt-Out Tools:** For analytics cookies like Google Analytics, you can use tools such as the Google Analytics opt-out browser add-on available at: [\*\*Google Analytics Opt-out Browser Add-on\*\*](#).

**Third-Party Cookies:** To manage cookies set by third parties, you can visit their respective privacy policies and opt-out mechanisms.

**Links for Managing Cookies in Popular Browsers:**

**Chrome:** [\*\*Chrome Cookie Management\*\*](#)

**Firefox:** [\*\*Firefox Cookie Management\*\*](#)

**Internet Explorer / Edge:** [\*\*Edge\*\*](#) or [\*\*Internet Explorer Cookie Management\*\*](#)

**Safari (Mac):** [\*\*Safari Cookie Management\*\*](#)

**Opera:** [\*\*Opera Cookie Management\*\*](#)

**Changes to Our Cookies Policy**

We may update this cookie policy periodically. We encourage you to review this policy regularly to stay informed about how we are using cookies.

*/18<sup>th</sup> February, 2025*