



Arctech Innovation Limited

Website Privacy Notice

Version: 1.0

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Introduction

We are Arctech Innovation Limited (“Arctech”, “we”, “us”, “our”). We are a limited company registered in England and Wales under registration number 09848787 with our registered office at The Cube, Londoneast-UK Business and Technical Park, Yew Tree Avenue, Dagenham, Essex, RM10 7FN.

Unless we notify you otherwise, we are the Controller of the Personal Data we process about you. This means that we decide what Personal Data to collect and how to process it.

We are registered as a Controller with the UK supervisory authority, the Information Commission (“IC”) in relation to our processing of Personal Data under registration number ZA313566.

Our Bugscents product may be purchased by individuals all over the world, and we are therefore committed to ensuring we meet our legal obligations when processing Personal Data under the data protection laws, which include but are not limited to the UK General Data Protection Regulation and EU General Data Protection Regulation 2016/679 (together referred to herein as the “GDPR”); the UK Data Protection Act 2018 and the Privacy and Electronic Communications (EC Directive) Regulations 2003. Consideration has also been given to the Federal and State laws applicable to the United States and any other region of the world in which we operate.

The purpose of this privacy notice is to explain what Personal Data we collect about you when you visit this website (<https://www.bugscent.com/>).

This privacy notice also explains your rights, so please read it carefully. If you have any questions, you can contact us using the information provided below under the ‘Contact us’ section.

Who this privacy notice applies to

This privacy notice applies to you if:

1. You visit our website;
2. You enquire about our product and/or services;
3. You give us feedback or contact us; or
5. You sign up to receive newsletters and/or other promotional communications from us.



What Personal Data is

‘Personal Data’ means any information from which someone can be identified either directly or indirectly. For example, you can be identified by your name or an online identifier.

‘Special Category Data’ is more sensitive Personal Data and includes information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data for the purposes of uniquely identifying someone, data concerning physical or mental health or data concerning someone’s sex life or sexual orientation. Personal Data’ means any information from which someone can be identified either directly or indirectly. For example, you can be identified by your name or an online identifier.

Personal Data we collect

We collect most of the Personal Data directly from you in person, by telephone, SMS, email or via our website. We may collect Personal Data from you to enable us to manage your account, facilitate networking, provide access to resources, and allow for collaboration and communication within the Bugscentis platform.

We may also collect your Personal Data from third parties such as:

- business and research partners within our network;
- reputable companies who provide lead generation contact lists;
- others to whom you have provided consent;
- publicly available sources such as social media platforms;
- sub-contractors in technical, payment and delivery services;
- advertising networks;
- analytics providers; and
- internet search providers.

Purposes for which we use Personal Data and the legal bases

We will only use your Personal Data when the law allows. Most commonly, we will use your Personal Data in the following circumstances:

Purpose	Personal Data	Lawful Basis for Processing
Responding to correspondence from you.	Contact details.	It is in our legitimate interest to respond to enquiries made via our website, by email, through our social channels or any other means.



Purpose	Personal Data	Lawful Basis for Processing
Sending you information which may be of interest.	Contact details.	If you are an existing member or have expressed an interest in our products or services, we will rely on legitimate interests to contact you for marketing purposes. You may object to the processing for this purpose by emailing dataprotection@arctechinnovation.com. If we have captured your consent for the purposes of marketing, that consent may be withdrawn at any time by emailing dataprotection@arctechinnovation.com.
Purchase a product	Contact details; shipping and billing address; payment details; and order and transaction data.	We process this Personal Data in the performance of the contract to you.
Business management, forecasting and statistical purposes.	Contact details; and Feedback responses.	It is our legitimate interest to identify areas for managing current business relationships, develop new products and services, and to manage our business.
Improving our websites and the overall website visitor and user experience.	IP address; Location data; Device ID; Model and device type; Name/version of the operating system; Settings and language of the device.	It is our legitimate interest to allow analytics and search engine providers to help improve and optimise our websites
Improving our websites and the overall website visitor and user experience.	Technical data; and Usage Information.	We use cookies on our websites with your consent, unless they are strictly necessary cookies, in which case your consent is not required



Where Personal Data is processed because it is necessary for the performance of a contract to which you are a party, we will be unable to provide our services without the required information.

Sharing your data

We may disclose your information to third parties in connection with other purposes set out in this privacy notice. These third parties may include:

- business partners, suppliers and sub-contractors who may process information on our behalf;
- advertisers, social media platforms, and advertising networks;
- analytics and search engine providers; and
- IT service providers.

This 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. When you leave our site, we encourage you to read the privacy policy of every website you visit.

Where we are under a legal or regulatory duty to do so, we may disclose your details to the police, regulatory bodies or legal advisors, and/or, where we consider necessary to protect the rights, property or safety of Arctech, its personnel, users or others.

How we protect your data

We implement appropriate technical and organisational measures to protect data against unauthorised or unlawful processing and against accidental loss, destruction or damage.

In addition to the technical and organisational measures we have put in place, there are simple things you can do to in order to further protect your personal information, such as:

- never share One Time Passcodes (OTPs);
- never enter your details after clicking on a link in an email or text message;
- always send confidential information by encrypted email to reduce risk of interception;
- if you are logged into any online service do not leave your computer unattended;
- close down your internet browser once you have logged off;
- never download software or let anyone log on to your computer or devices remotely, during or after a cold call; and
- you can easily identify secure websites by looking at the address in the top of your browser which will begin https:// rather than http://.



Your data protection rights

There are certain fundamental rights that you have in respect of your Personal Data:

Rights	Description
Right to be informed	Individuals have the right to be informed about the collection and use of their Personal Data
Right of access	Individuals have the right to receive a copy of their Personal Data, and other supplementary information
Right to rectification	Individuals have the right to have inaccurate Personal Data rectified or completed if it is incomplete
Right to erasure	Individuals have the right to request their personal information to be erased, in certain circumstances
Right to restrict processing	Individuals have the right to request the restriction or suppression of their Personal Data, in certain circumstances, in particular: • if your data is not accurate; • if your data has been used unlawfully but you do not want us to delete it; • if your data is no longer needed, but you want us to keep it for use in legal claims; or • if you have already asked us to stop using your data but you are waiting to receive confirmation from us as to whether we can comply with your request
Right to data portability	Individuals have the right to obtain and reuse their Personal Data, in a machine-readable format, for their own purposes across different services, in certain circumstances
Right to object	Individuals have the right to object to the processing of their Personal Data, in certain circumstances Where we are using your Personal Data because it is in our legitimate interests to do so, you can object to us using it this way Where we are using your Personal Data for direct marketing, including profiling for direct marketing purposes, you have an absolute right to ask us to stop doing so



Rights	Description
Rights with respect to automated decision-making and profiling	Individuals have the right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

In addition to the above, an individual also has the following rights:

Rights	Description
Right to withdraw consent	Where we are using your Personal Data based on your consent, you can withdraw your consent at any time
Right to register a complaint with the Controller	You have the right to raise a complaint with the Controller if you feel we are not complying with data protection law or this privacy notice
Right to lodge a complaint with a supervisory authority	You have the right to raise a complaint about how we handle your personal information with a relevant supervisory authority.

Exercising your data protection rights

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 for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

International Transfers

Depending on the organization(s) we use to provide our services to you, your Personal Data may be processed outside of the UK and/or European Economic Area ("EEA").

Therefore, we have taken appropriate steps to ensure that the Personal Data processed by such organizations has an essentially equivalent level of protection to that guaranteed in the UK/EEA. We do this by ensuring that:

- Your Personal Data is only processed in a country which the Secretary of State or European Commission has confirmed has an adequate level of protection (an adequacy decision) or
- We enter into an [International Data Transfer Agreement](#) ("IDTA") or use the International Data Transfer Addendum to the [European Commission's Standard Contractual Clauses](#) ("SCCs) for international data transfers) with the receiving organization, and adopt supplementary measures where necessary.



How long we keep your data

We will retain your personal data for as long as is necessary to provide you with our services and for a reasonable period thereafter to enable us to meet our contractual and legal obligations and to deal with complaints and claims.

At the end of the retention period, your personal data will be securely deleted or anonymised. For example, this could be by aggregation with other data so that it can be used in a non-identifiable way, for statistical analysis and business planning.

Children's Privacy

We do not offer our products and services to children, and we do not knowingly collect Personal Data of children without parental consent (unless permitted by law). If you are under 18 years of age, you must not use our services. If we learn that a child has provided us with their Personal Data we will securely and permanently delete it.

Contact us

If you would like to exercise your statutory data protection rights, or if you have any concerns or questions about how we handle Personal Data, please contact us using the details below:

Arctech Innovation Limited
The Cube Londoneast-UK Business and Technical Park
Yew Tree Avenue
Dagenham
Essex
RM10 7FN

Alternatively, you can email us at dataprotection@arctechinnovation.com.

How to complain

You have the right to lodge a complaint with the relevant supervisory authority if you are concerned about the way in which we are handling your Personal Data. The supervisory authority in the UK is the Information Commission who can be contacted online at: [Contact us | IC](#), or by telephone on 0303 123 1113.

For supervisory authorities in other countries within the EU, please see the link below:

https://edpb.europa.eu/about-edpb/about-edpb/members_en

If you reside in the U.S. or Canada, you can make a complaint at any time to your relevant supervisory authority if you are concerned about the way in which we are handling your personal information, or if you feel that we are infringing data protection law.



Data Protection Officer

We do not have a statutory requirement to appoint a Data Protection Officer (“DPO”) under the UK GDPR. However, for accountability and compliance purposes, we have voluntarily appointed [Evalian Limited](#), a company specialising in data protection, cyber security and information security, as our DPO. Evalian Limited can be reached at dpo@evalian.co.uk.

Changes to this privacy notice

We may update this notice (and any supplemental privacy notice), from time to time and will notify you of any changes when we are required to do so. When changes are made, we will amend the ‘Last updated’ date at the top of this document.