

How We Use Your Data Privacy & Cookie Policy

Privacy Policy

Aran Group Holdings Limited and all subsidiary companies including but not limited to Aran Insulation Limited and Aran Energy Funding Limited (Aran) (we/our) are committed to protecting and respecting your privacy.

This policy (together with our terms of use and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purpose of the Data Protection Act 2018 (the Act) and the General Data Protection Regulation (in force from 25 May 2018), the data controllers are:

- Aran Insulation Limited, data protection registration number ZA516676
- Aran Energy Funding Limited, data protection registration number ZA806157

1 INFORMATION WE MAY COLLECT FROM YOU

We may collect and process the following data about you:

- a) information that you provide by filling in forms at www.arangroup.co.uk. This includes information provided at the time of registering to use our site, ordering products, posting material or requesting further services. We may also ask you for information when you report a problem with our site;
- b) information provided to other organisations where you have provided your consent to those organisations passing your data to third parties;
- c) if you contact us, we may keep a record of that correspondence;
- d) we may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them; and
- e) details of your visits to our site including, but not limited to, traffic data, location data, weblogs and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access.

2 IP ADDRESSES AND COOKIES

- 2.1 We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.
- 2.2 Our site also uses Google Analytics, a web analysis service provided by Google Inc (Google). Google Analytics uses "cookies", which are text files placed on your computer to help the website analyse how you use our site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other

data held by Google.

3 USING BROWSER SETTINGS TO MANAGE COOKIES

- 3.1 The Help menu on the menu bar of most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie and how to disable cookies altogether.
- 3.2 You can also disable or delete similar data used by browser add-ons, such as Flash cookies, by changing the add-on's settings or visiting the website of its manufacturer.
- 3.3 As cookies allow you to take advantage of some of the Website's essential features, we recommend you leave them turned on. For example, if you block or otherwise reject cookies you will not be able to make an enquiry or submit personal data online. If you leave cookies turned on, remember to sign off when you finish using a shared computer.

4 COOKIES EXPLAINED

- 4.1 In order to comply with new rules, we use a system of classifying the different types of cookies which we use on our site, or which may be dropped by third parties through our websites. The classification was developed by the International Chamber of Commerce UK and explains more about which cookies we use, why we use them, and the functionality you will lose if you decide you don't want to have them on your device.

5 WHAT IS A COOKIE?

- 5.1 Cookies are text files containing small amounts of information which are downloaded to your personal computer, mobile or other device when you visit a website. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognises that cookie. Cookies are useful because they allow a website to recognise a user's device.
- 5.2 Persistent cookies - these cookies remain on a user's device for the period of time specified in the cookie. They are activated each time that the user visits the website that created that particular cookie.
- 5.3 Session cookies - these cookies allow website operators to link the actions of a user during a browser session. A browser session starts when a user opens the browser window and finishes when they close the browser window. Session cookies are created temporarily. Once you close the browser, all session cookies are deleted.
- 5.4 Cookies do lots of different jobs, like letting you navigate between pages efficiently, remembering your preferences, and generally improve the user experience. They can also help to ensure that adverts you see online are more relevant to you and your interests.
- 5.5 You can find more information about cookies at www.allaboutcookies.org and www.youronlinechoices.eu.

6 COOKIES USED ON THE WEBSITE

- 6.1 A list of all the cookies used on the Website by category is set out below.
- 6.2 Strictly necessary cookies
These cookies enable services you have specifically asked for. For those types of cookies that are strictly necessary, no consent is required.
- 6.3 These cookies are essential in order to enable you to move around the site and use its features, such as accessing secure areas of the site. Without these cookies services you have may asked for, like shopping baskets or e-billing, cannot be provided.

6.4 Performance cookies

These cookies collect anonymous information on the pages visited. By using the site, you agree that we can place these types of cookies on your device.

6.5 These cookies collect information about how visitors use the site, for instance which pages visitors go to most often, and if they get error messages from web pages. These cookies don't collect information that identifies a visitor. All information these cookies collect is aggregated and therefore anonymous. It is only used to improve how the site works.

6.6 Functionality cookies.

These cookies remember choices you make to improve your experience. By using the site, you agree that we can place these types of cookies on your device.

These cookies allow the site to remember choices you make (such as your user name, language or the region you are in) and provide enhanced, more personal features. These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customise. They may also be used to provide services you have asked for such as watching a video or commenting on a blog. The information these cookies collect may be anonymised and they cannot track your browsing activity on other websites.

6.7 Targeting or advertising cookies

These cookies collect information about your browsing habits in order to make advertising relevant to you and your interests.

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. They are usually placed by advertising networks with our permission. They remember that you have visited a website and this information is shared with other organisations such as advertisers. Quite often targeting or advertising cookies will be linked to site functionality provided by the other organisation.

Cookie	Name	Purpose	More Information
Identifying Unique Visitors	_utma	Each unique browser that visits a page on your site is provided with a unique ID via the _utmcookie. In this way, subsequent visits to your website via the same browser are recorded as belonging to the same (unique) visitor. Thus, if a person interacted with your website using both Firefox and Internet Explorer, the Analytics reports would track this activity under two unique visitors. Similarly if the same browser were used by two different visitors, but with a separate computer account for each, the activity would be recorded under two unique visitor IDs. On the other hand, if the browser happens to be used by two different people sharing the same computer account, one unique visitor ID is recorded, even though two unique individuals accessed the site.	Expires in one day

Cookie	Name	Purpose	More Information
Determining Visitor session	_utmb	The Google Analytics tracking for ga.js uses two cookies to establish a session. If either of these two cookies are absent, further activity by the user initiates the start of a new session.	Expires in 30 mins
Determining visitor session	_utmz	See above	Expires in 2 years from update
Custom Variables	_utmv	You can define your own segments for reporting on your particular data. When you use the <code>_setCustomVar()</code> method in your tracking code to define custom variables, Google Analytics uses this cookie to track and report on that information. In a typical use case, you might use this method to segment your website visitors by a custom demographic that they select on your website (income, age range, product preferences).	Expires in 6 months from update
Tracking Traffic Sources&Navigation	_utmz	When visitors reach your site via a search engine result, a direct link, or an ad that links to your page, Google Analytics stores the type of referral information in a cookie.	Expires in 6 months from update
Tracking Traffic Sources using java script	Has_js	someone with a js-enabled browser has visited the site previously (maybe in a previous installation or something)	Expires in 30 mins

7 BEHAVIOURAL AND ONLINE PRIVACY

7.1 A guide to behavioural advertising and online privacy has been produced by the internet advertising industry which can be found at <https://www.youronlinechoices.com/uk/>. The guide contains an explanation of the IAB's self-regulatory scheme to allow you greater control of the advertising you see.

8 DATA COLLECTED BY GOOGLE TAG MANAGER

8.1 In order to monitor system stability and performance, Google Tag Manager may collect some aggregated data about tag firing. This data does not include user IP addresses or any user-specific identifiers that could be associated with a particular individual.

9 WHERE WE STORE YOUR PERSONAL DATA

9.1 The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (EEA). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff maybe engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We

will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

- 9.2 All information you provide to us is stored on our secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.
- 9.3 Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; 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.

10 USES MADE OF THE INFORMATION

10.1 We use information held about you in the following ways:

- a) to ensure that content from our site is presented in the most effective manner for you and for your computer;
- b) to provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes;
- c) to carry out our obligations arising from any contracts entered into between you and us;
- d) to notify you about changes to our service;
- e) in accordance with our legitimate interests in protecting our legitimate business interests and legal rights, including but not limited to, use in connection with legal claims, compliance, regulatory and investigative purposes (including disclosure of such information in connection with legal process or litigation);
- f) with your express consent to respond to any comments or complaints we may receive from you, and/or in accordance with our legitimate interests including to investigate any complaints received from you or from others, about our website or our products or services, and
- g) we may use your information to invite you to take part in market research or surveys.

10.2 We may also use your data, or permit selected third parties to use your data, to provide you with information about goods and services which may be of interest to you and we or they may contact you where you have consented to be contacted for such purposes.

10.3 If you have consented to be contacted but no longer want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please notify us at info@arangroup.co.uk

10.4 DISCLOSURE OF YOUR INFORMATION

We may disclose your personal information to subsidiaries to process it for the purposes of inter-group administration and to deliver products or services where elements of these are provided by group companies other than those with which you have directly contracted. We may also disclose your personal information to third parties:

- a) in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets; or
- b) if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or

- c) to protect the rights, property, or safety of Aran, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction;
- d) our professional advisors such as our auditors and external legal and financial advisors;
- e) marketing and communications agencies where they have agreed to process your personal data in line with this Privacy Notice;
- f) market research companies;
- g) our suppliers, business partners and sub-contractors; and/or
- h) search engine and web analytics.

Personal data may be shared with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if needed for the legal protection of our legitimate interests in compliance with applicable laws. Personal data may also be shared with third party service providers who will process it on our behalf for the purposes above. Such third parties include, but are not limited to, providers of website hosting, maintenance, call centre operation and identity checking.

11 HOW LONG WE KEEP INFORMATION FOR

- 11.1 We will not keep your personal information for any purpose for longer than is necessary and will only retain the personal information that is necessary in relation to the purpose. We are also required to retain certain information as required by law or for as long as is reasonably necessary to meet regulatory requirements, resolve disputes, prevent fraud and abuse, or enforce our terms and conditions.
- 11.2 Where you are a customer, we will keep your information for the length of any contractual relationship you have with us and after that for a period of 12 months.
- 11.3 Where you are a prospective customer and you have expressly consented to us contacting you, we will only retain your data (a) until you unsubscribe from our communications; or, if you have not unsubscribed, (b) while you interact with us and our content; or (c) for 12 months from when you last interacted with us or our content.
- 11.4 In the case of any contact you may have with our customer services team, we will retain those details for as long as is necessary to resolve your query and for 12 months after the query is closed.
- 11.5 We will retain your data for a short time beyond the specified retention period, to allow for information to be reviewed and any deletion to take place. In some instances, laws may require us to hold certain information for specific periods other than those listed above.

12 YOUR RIGHTS

- 12.1 You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at info@arangroup.co.uk
- 12.2 Our site 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.

12.3 If the information we hold about you is inaccurate or incomplete, you can notify us and ask us to correct or supplement it.

13 ACCESS TO INFORMATION

You have the right, with some exceptions and qualifications, to ask us to provide a copy of any personal data we hold about you.

Where you have provided your data to us and it is processed by automated means, you may be able to request that we provide it to you in a structured, machine readable format.

If you have a complaint about how we have handled your personal data, you may be able to ask us to restrict how we use your personal data while your complaint is resolved. In some circumstances you can ask us to erase your personal data (a) by withdrawing your consent for us to use it; (b) if it is no longer necessary for us to use your personal data; (c) if you object to the use of your personal data and we don't have a good reason to continue to use it; or (d) if we haven't handled your personal data in accordance with our obligations.

14 CHANGES TO OUR PRIVACY POLICY

Any changes we may make to our privacy policy in the future will be posted on this page, please check back for updates.

15 CONTACT

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to info@arangroup.co.uk.