Privacy Policy

This Privacy Policy (together with the Terms of Use) sets out the basis on which we will process any personal data collected from you or provided by you via or in relation to the website springstarter.com (the "Site"), as well as data collected by any other means, for the purpose of carrying out our business. Please read the following Privacy Policy to understand how we use and protect the information that you provide.

1. CONTACT US

1.1 For the purpose of the Data Protection Act 1998 (the "Act") and the EU General Data Protection Regulation (GDPR), any personal data that you submit or that is collected from you, the data controller is Kineteco International Limited a limited company registered in England and Wales (Company No. 03394741) (referred to as "we", "us", "our"). Our registered office and postal address is 10 Willesborough Industrial Park, Kennington Road, Ashford, Kent TN24 0TD.

Terms defined in the Terms of Use shall have the same meaning when used in this Privacy Policy.

If you want to know what information we hold about you or if you have any other queries in relation to this Privacy Policy, our contact details are as follows:

Email address: info@springstarter.com

2. INFORMATION THAT WE COLLECT ABOUT YOU

- 2.1 We may collect information that you provide when you use the Site and when you contact us for any reason.
- 2.2 When you send us an enquiry, we will retain all the details. Should such enquiry lead to an order from you, we will retain the full details of the transaction, including your address and the destination address of the goods shipped, if different. This data will be held indefinitely, to enable us to provide after sales support for our products which can and do last for many decades.
- 2.3 We will also collect personal information about you that is contained in any correspondence that you send to us. For example, if you contact us, we may keep a record of that correspondence by reference to your name or address. We may also ask you for information when you report a problem with the Site or with anything contained on the Site.
- 2.4 We may collect generic information about your visits to and how you use the Site. We may therefore collect information such as your IP addresses, geographical location, browser type, referral source, length of visit and number of page views. Individual users will not be identifiable from this information and we may use this information for a number of purposes

including website administration, optimising the use of the Site, disclosing to third party contributors or for security purposes.

3. HOW WE USE YOUR INFORMATION

- 3.1 We will only use your information for the following purposes:
 - to ensure that content from the Site is presented in the most effective manner.
 - to enable us to supply and support the products you order from us.
 - to provide customer service in relation to the delivery of our products, after sales support and maintain records for warranty purposes.
 - to internally monitor usage of the Site to enable us to improve the Site.

4. DISCLOSURE OF YOUR INFORMATION

- 4.1 Other than as expressly set out in this Privacy Policy or as otherwise required or permitted by law, we will not share, sell or distribute any of the information you provide to us without your consent.
- 4.2 We may disclose your personal information to: Any data processor who undertakes any of the functions referred to in section 3 above on our behalf (including without limitation for the purposes of processing payments, undertaking newsletter mailings, designing, maintaining and administering the Site).

Any person to whom disclosure is necessary to enable us to enforce this Privacy Policy or the Terms of Use, or to protect any of our rights or property. This may include exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

Our accountants, auditors and payroll services suppliers will all have access to the information deemed necessary for them to perform their services.

5. COOKIES

- 5.1 The following explains how we use cookies on the Site.
- 5.2 We use Google Analytics to collect information about how website visitors use and improve the site. Google Analytics collects information in an anonymous form and will not allow us to identify you or collect any personal information about you. Google Analytics do not track your internet activity after leaving the Website.

6. THIRD PARTY CONTENT, SITES AND CONTRIBUTORS

- 6.1 The Site may contain content and links to websites and microsites that are operated by third parties.
- 6.2 We do not control and accept no liability or responsibility for these third party websites and microsites nor for the third party content, advertisements and cookies. This Privacy

Policy does not apply to such websites, microsites, content, advertisements and cookies and any information they collect by virtue of you clicking on that link will be collected and used in accordance with the privacy policy of that third party. Please therefore consult the terms and conditions and privacy policy of those third party websites and microsites to find out how they collect and use your personal data and to establish whether and for what purpose they use cookies.

6.3 If you have any queries or complaints in relation to such third party sites, content, advertisements and/or links which feature or can be accessed via the Site, please contact us.

7. SECURITY AND DATA RETENTION

7.1 We and all third parties that process personal data on our behalf employ reasonable security measures to protect your information from access by unauthorised persons and against unlawful processing, accidental loss, destruction and damage. We will retain your information for a reasonable period in order to achieve or facilitate the purposes described above or as long as the law requires or permits. As our products can last many decades, we will retain data for so long as we expect there is a possibility that we may be asked to supply spare parts or servicing.

8. YOUR RIGHTS

- 8.1 You are entitled to know what personal data we hold about you and you may ask us to make any necessary changes to ensure that it is accurate and kept up to date. If you wish to do this, please contact info@springstarter.com.
- 8.2 You may request us to cease sending you any correspondence, email updates and newsletters at any time by notifying us in writing or following any "unsubscribe" instructions included in any email sent to you.
- 8.4 Please let us know if the personal information which we hold about you needs to be corrected or updated at any time.
- 8.5 If you want to make a complaint about the way we have processed your personal information, you can contact the Information Commissioner's Office in their capacity as the statutory body which oversees data protection law www.ico.org.uk/concerns. Or by post at: Information Commissioner's Office Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.