

Warmup[®]

The world's **best-selling** floor heating brand™

Privacy Notice

Effective from 22 February 2019

www.warmup.co.uk

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1.Our contact details

Our postal and email address is:

Post

Warmup Plc.
Unit 702 & 704 Tudor Estate,
Abbey Road,
London
NW10 7UW.

Email

personaldata@warmup.com

2.Our Data Protection Officer

Our Data Protection Officer is David Stimpson who can be contacted using the details in section 1.

If contacting us by post, please mark the envelope 'Data Protection Officer'.

3.Links to third-party websites

Our sites and apps may contain links to and from websites of our partner networks, advertisers and affiliates.

This privacy policy does not cover how third-party websites process your personal information.

Please check you are satisfied with their privacy policies before giving any personal data to these websites.

4. What personal data is collected

Summary:

This section describes the types of personal data we collect from you when you:

- Visit our websites
- Purchase products from us
- Use a Smart Thermostat
- Register with us for a service or membership
- Use one of our smartphone apps.

We collect your personal data only where we are permitted to do so by law.

The reasons we collect your personal data are to:

- Process your enquiry or registration
- Process payments
- Organise deliveries of any products you've ordered from us
- Activate and operate a Smart Thermostat and app.

You are not obliged to provide us with your personal data, however, without it, we will be unable to provide any goods or services to you and our Smart Thermostats and app will not operate fully.

More detail about the types of personal data we collect is provided below:

Browsing our sites

When you visit our website, a cookie is placed on your computer.

Cookies are text files that help to improve your web browsing experience by holding information and any user preferences so that they don't need to be entered again.

Cookies also help us to improve our websites by providing anonymous analytical data, through Google Analytics, about visitors to our websites.

Cookies hold your computer's IP address, the operating system and web browser type, for system administration purposes. This is statistical data about user's general browsing actions and patterns and does not personally identify any individual.

You can deactivate cookies at any time by activating the relevant setting in your internet browser. Please note if cookies are deactivated, certain functions of our websites will not function fully, such as updating the shopping basket in our online store.

Detail about the cookies used and their purpose is provided below.

- Facebook targeting: used by Facebook to target the paid ads to a relevant audience
- Google Analytics: used by Google to track analytics behaviour, goals and visits
- Google Analytics_utma: used by Google to track analytics behaviour, goals and visits
- Google Analytics_utmz: used by Google to track analytics behaviour, goals and visits
- Wordpress_test_cookie: Cookie used by WordPress CMS to keep user session data
- Google tag tracking: marketing tag used by Google Analytics to track user interaction with website
- PHP SESSION Cookie: used by all forms you might fill in which collect customer data
- Cookie Notice: displays the cookie policy and remembers if the cookie was accepted.

Filling in forms on our sites

When completing our website contact us, quote request or any other type of registration form, you will need to provide us your personal information. This is so that we can:

- Contact you about your enquiry
- Enable the purchase and registration of a product
- Enable the registration of an account (e.g. Warmup Pro)
- Activate a product warranty.

In addition to processing your request, we would also like to send you promotional information about related products and services.

We will only contact you with this information if you have given us prior consent, by selecting the opt-in option within the related form. If you decide later you do not want any further marketing information from us, please select the unsubscribe option in the relevant marketing email.

Purchasing products from us

Card payments are processed through PCI DSS compliant systems to ensure data security.

When you purchase product from us we need to collect your name, telephone number, email address and postal address so we can process your payment and arrange delivery of the product. We do not store your card details.

If you purchase a 5iE Wireless Smart Thermostat with professional installation and setup, we use the services of HomeServe, who have their own network of installers.

For HomeServe to be able to fulfil the installation of the 5iE Wireless Smart Thermostat, we share with them the name, postal address, email address and your phone number. This information is only used to enable the installation to take place.

Interacting with us on social media

We have a presence on Facebook, Twitter, Instagram, Pinterest, Google+, YouTube and LinkedIn. If you would like to participate in discussion boards, enter a competition, promotion or survey, or follow us to receive job-related updates you would need to provide information such as your name and email address when registering.

We do not collect any personal data other than that which is collected by the social media service itself. We recommend that you review the privacy policies of the social media platforms before using them.

Using a Smart Thermostat and app

You may give us information about yourself by filling in forms on our Autoswitch or MyHeating mobile application, or our web equivalent of the application www.my.warmup.com.

When using our Smart Thermostat, the types of personal data you provide, or the thermostats collect, is listed below, along with the reason it is collected:

Entered by you into the Thermostat and/or the MyHeating application:

- **Address:** Allows comparisons of energy usage and patterns with local area. Information is grouped to compare areas with other areas
- **Name:** To address the user appropriately when using the interface
- **Email Address:** Enable us to contact the user with information about their account
- **Postcode:** Allow comparisons of energy usage and patterns with local area. Grouped to compare areas with other areas-this may include publication of information in an anonymised form
- **Credit card details/payment:** Allows users to make payments to Warmup for future services. Card details are only held by the utility company for purposes of enabling payment as part of Autoswitch™
- **Occupation:** To improve the accuracy of Warmup's energy saving algorithms - occupation affects working hours and likelihood of inconsistent overrides to program.

Collected Wirelessly by the Thermostat

- **IP address:** Server can identify IP address accessing it and control devices.

5.Our legal bases for processing your personal data

Summary:

This section explains which legal grounds we use under data protection law to process your personal data.

There are four legal bases we use to process personal data, explained below:

Contractual obligations

We rely on this basis where processing personal data is necessary to provide you with the information, products and services that you request from us.

Consent

For home-owners, we may use and process their personal information to send energy saving advice and promotional information relating to our products. We will only send this information when we have obtained prior consent. We never pass on personal details to other companies for marketing purposes.

If you choose to receive promotional information from us you can opt out of receiving any further information from us by clicking the unsubscribe link at the bottom of any promotional email we send, or by contacting us by email at: personaldata:warmup.com.

Legitimate interests

Legitimate interest means personal data can be collected to meet the interests of our business. This enables us to provide you with the service or product you requested. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests

We will rely on legitimate interests to:

- Maintain, monitor and improve the performance of our websites enable us to create new services and improve our products
- Send related promotional information to our customers.

Legal compliance

We will rely on this basis to enable us to comply with financial legislation or to support an investigation into any criminal activity. We may pass the data of people involved with criminal acts to law enforcement if required.

6. Sharing your personal data

We may share your personal 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.

We may share your information with selected third parties including:

- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you
- Advertisers and other third parties that require the data to select and serve relevant adverts to you and others. We may provide them with aggregate information about our users (for example, we may inform them that 500 men aged under 30 have clicked on their advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example women in SW1). The information may be used to help us, and third parties analyse heating and energy usage. We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience
- Analytics and search engine providers that assist us in the improvement and optimisation of our site
- Credit reference agencies, to assess your credit score where this is a condition of us entering into a contract with you.

We may disclose your personal information to third parties:

- If 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 should it be necessary
- If Warmup Plc or its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets
- If we are under a duty to disclose or share your personal data to comply with any legal obligation or to enforce or apply our Terms and Conditions or Terms and Conditions of Supply and other agreements; or to protect the rights, property, or safety of Warmup Plc, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

7. Where your personal data is stored

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 may be engaged in 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. If we do so, we'll make sure that suitable safeguards are in place before this takes place. For example, by using approved contractual agreements, unless certain exceptions apply.

8. Data security

We ensure that your data is treated securely.

All information you provide to us is stored in secure cloud-based servers.

We use SSL encryption technology to protect your personal data against loss, theft, misuse, unauthorised access and disclosure.

We regularly monitor our system for vulnerabilities and attacks, to identify ways to further strengthen security.

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.

9. How long we hold your personal data for

We only hold your personal data for as long as required, based on the following criteria:

As determined by legal and regulatory requirements. One example of this would be the need to retain your data associated with any financial transactions for a minimum period as required under financial law.

For as long as we have a legitimate interest to do so. This includes managing our customer relationships, enabling certain products to operate, or to honour a product warranty for its full duration.

10. Your data protection rights

Summary:

This section explains your legal rights concerning personal data we hold and how you can contact us to exercise these rights.

The right to be informed

We use this privacy policy to inform you about how we process your personal data.

The right of access

You have the right to ask for a copy of the information that we hold about you. Please note we may not provide you with a copy of your personal information if this concerns other individuals or we have another lawful reason to withhold that information.

The right to change data

If you change your name or address/email address, or you discover that any of the other information we hold is inaccurate or out of date, please let us know by contacting us. You can, in certain situations such as on the Warmup Pro site, change your personal data at any time within your profile.

The right to object to us processing your personal information

You may withdraw consent from us to use your personal information for marketing purposes at any time and we will comply with your request. If you would like to withdraw your consent, please select the unsubscribe option in the marketing email we send to you.

The right to restrict our processing of your personal information

You can ask us to temporarily limit the use of your personal data if you are concerned about the accuracy of any data we hold or if we have processed your data unlawfully.

The right to have your personal information erased

You can ask us to delete your personal data in certain circumstances:

- There is no justifiable reason for us continuing to process it
- We have not complied with data protection law.

Please note that this right is limited. We may not always be able to action your request of erasure for legal or product performance reasons, such as enabling an activated Smart Thermostat to function. If we are unable to erase your data, we will let you know of the reasons why at the time of your request.

How to exercise your rights

Please contact our Data Protection Officer by email at personaldata@warmup.com or by post.

If submitting a request about your data, please clearly state what information you require from us.

For data security purposes, we may ask you to provide proof of identification if we cannot identify you from the contact details provided. Any copy identification information provided by you will be destroyed by us immediately after use.

How long we take to process your request

We will process legitimate requests within one month, starting from the first date we received it. Please note if the one-month deadline to respond falls on a weekend or public holiday, we have until the next working day after the deadline to respond to you.

If we are unable to process your request in full, we will let you know within one month of receiving your request and explain why.

Processing fee

For legitimate and straightforward requests, you will not have to pay a processing fee. Please note if the request is complicated, or you have made multiple requests within the same period we may need to extend the processing time and charge you a processing fee. If this is the case, we will inform you about this and keep you updated on progress with your request.

Your right to complain

If you are not satisfied with the response you receive from us, please contact us by email at: complaints@warmup.com.

If after we have received your complaint your request has still not been satisfactorily resolved, you can make a complaint to the data protection regulator, the Information Commissioner's Office: <https://ico.org.uk>.