Privacy Policy

This Privacy Statement describes how Varilight manage personal information and respect your privacy. This policy may be amended from time to time. We encourage users of our website to regularly review our Privacy Policy.

This statement covers the way we use your personal information when you visit our website, contact us to resolve a query, make an enquiry or when you place an order. The steps we take to protect your information and how to review or correct the information we hold are also detailed here. By accessing our website or providing your information when you contact us, you are consenting to the collection and use of information practices described in this privacy statement.

For the purpose of this Policy:

Data Protection laws means all applicable laws relating to the processing of personal data, including the UK General Data Protection Regulation.

Data Subject means the individual to whom the personal data relates

Personal data means any information that relates to an individual who can be identified from the information.

Processing means any use that is made of data, including collecting, storing, amending, disclosing or destroying it.

All Personal Data that we collect and maintain will be subject to this Privacy Policy, as amended from time to time. To update your information and preferences, see the section entitled "Updating Your Personal Information and Privacy Preferences."

When we refer to “Varilight”, we mean the Varilight entity that acts as the controller or processor of your information, as explained in more detail in the "Entities Collecting Personal Information" section below.

ENTITIES COLLECTING PERSONAL INFORMATION

Varilight is the brand name of Doyle & Tratt Products Ltd, which is the legal entity. This privacy notice is issued by Doyle & Tratt Products Ltd so when we mention “Varilight”, "we", "us" or "our" in this privacy notice, we are referring to Doyle & Tratt Products Ltd, Carylls Lea, Faygate, West Sussex, RH12 4SJ, United Kingdom. Our telephone number is +44 1293 851540.

We have appointed a data protection officer (DPO) for Doyle & Tratt Products Ltd who is responsible for overseeing questions in relation to this privacy notice. If you have any questions, concerns, or requests about this privacy notice, how we manage your Personal Information, or any other issue relating to your Personal Information, please contact our DPO:

Doyle & Tratt Products Ltd - Attn: Data Protection Officer
Carylls Lea, Faygate, West Sussex, RH12 4SJ, United Kingdom.
privacy@varilight.co.uk
Telephone number: +44 1293 851540
https://www.varilight.co.uk/help

Data Protection Law requires us to meet at least one “legal ground” for processing, currently set out in Article 6 of the General Data Protection Regulation. The grounds applicable to the personal data to which this notice relates are:

- **Contract**
  Where the processing is necessary for us to perform a contract that you are party to, or to take steps at your request prior to entering a contract, example we use your personal information to process your orders and payments or to give you a refund, send communications to you about your orders.

- **Legal obligation**
  Where the processing is necessary for compliance with a legal obligation to which we are subject for example we need to identify you when you contact us, verify the accuracy of data that we hold about you or assist HMRC and/or the Police and/or other regulatory bodies in relation to an investigation by a public authority.

- **Vital Interest**
  In certain circumstances it is in your vital interests for us to process your personal information. We may need to contact you if there are any urgent safety or product recall notices or where we otherwise reasonably believe that the processing of your personal information will prevent or reduce any potential harm to you.

- **Legitimate interest**
  Where processing is necessary for the purposes of our legitimate interests or the legitimate interests of a third party

COLLECTION OF PERSONAL INFORMATION

As a visitor to the website, you can engage in most activities without providing any Personal Information. On certain pages, such as when you register to use our Customer Services ticket system, in order to provide a service, we may collect the following Personal Information from you:

- Contact information such as your name, phone numbers, address and email address; and

- Demographic information such as your job title and company name; and

- Profile data, including details about your purchases and any questions you ask us about our products

- Images and videos that you submit to clarify your questions

- Depending upon the activity, some of the information that we ask you to provide is identified as mandatory and some as voluntary. If you do not provide the mandatory data we may not be able to provide a service.

As is true of most websites, when you use our website, Varilight or third parties contracted by Varilight may also collect certain technical and routing information about your computer to facilitate

your use of the website and its services. For example, we may log environmental variables, such as browser type, operating system, CPU speed, and the Internet Protocol (IP) address of your computer. We use these environmental variables to facilitate and track your use of the website and its services. Varilight also uses such environmental variables to measure traffic patterns on the website. We do not match this information to any personal information we hold about you.

In order to reduce errors in our database, authenticate our users, and prevent abuse of our system, we may on occasion supplement the Personal Information you submit to us with information from third-party sources. For example, we may supplement your contact information with address information provided by the Royal Mail such as a post code.

YOUR RIGHTS

You have the following rights in relation to your Data:

- **Right to access**: the right to ask us for access to the data we hold about you also known as Subject Access Request;
- **Right to correct:** the right to ask us to rectify any data that we hold about you that is inaccurate or incomplete
- **Right to erase**: the right to ask us to delete your data in certain circumstances
- **Right to restrict our use of your data**: the right to block us from using your data or limit the way in which we can use it.
- **Right to data portability**: the right to request that we move, copy or transfer your data
- **Right to object**: the right to object of our use of your data including where we use it for our legitimate interests

To make enquires, exercise any of the rights mentioned above or withdraw your consent to the processing of your data (where consent is our legal basis for processing your data), please contact us at privacy@varilight.co.uk.

We may need to ask you for a proof of identification before your request can be processed. We will let you know if we need to verify your identity and the documentation we require.

We will respond to your request within a calendar month.

UPDATING YOUR PERSONAL INFORMATION AND PRIVACY PREFERENCES

If you have subscribed to our newsletter emails then you have the right to access and correct your Personal Information and preferences at any time to unsubscribe. This may be accomplished by clicking on the link at the bottom of each email.

HOW YOUR PERSONAL INFORMATION IS USED

Varilight collects your information in order to provide services to you, comply with our legal obligations, and to improve our products and services. We do not sell, rent or share your personally identifiable information to or with third parties.

The ways we may use this information include, but are not limited to:

- Registering your rights, if any, to technical support
- Responding to customer service requests, questions and concerns

If you have a trade account with Doyle & Tratt Products Ltd we may use your information to:

- Administer your account.
- Send you order / renewal confirmations.
- Send you requested product or service information.
- Process financial transactions.

If you subscribe to our email newsletter or other mailing list we may use your information to:

- Keep you informed about our product range
- Administer promotions and competitions you enter and notify you of the results.
- Customize your experience, including targeting our services and offerings to you.

If you apply for employment with us we may use the information you provide to consider your application. If your application is unsuccessful we will keep the information for a limited period of time unless you request that we do not.

In certain situations, Varilight may be required to disclose personal data in response to lawful requests by public authorities, including meeting national security or law enforcement requirements.

Where required by law (e.g., to comply with a court order, or legal process served on Varilight), and when we believe that disclosure is necessary to protect our rights, avoid litigation, protect your safety or the safety of others, investigate fraud, and/or respond to a government request. We may also disclose information about you if we determine that such disclosure should be made for reasons of national security, law enforcement, or other issues of public importance.

INFORMATION SHARING WITH SERVICE PROVIDERS / AGENTS

Varilight may share Personal Information with certain companies that perform services on our behalf. We only share the Personal Information which is necessary for them to perform those services. We require any company with which we may share Personal Information to protect that data in a manner consistent with this policy and to limit the use of such Personal Information to the performance of services for Varilight, such as MailChimp which administers our email newsletter.

We do not sell or otherwise provide Personal Information to other companies for the marketing of their own products or services.

DATA RETENTION

We will retain your information for as long as your account is active, your information is needed to provide you services, or as required to fulfil our legal obligations.

If you wish to delete your account or request that we no longer use your information to provide you services contact us at privacy@varilight.co.uk.

We will respond to your request within 30 days. We will retain and use your information as necessary to comply with our legal obligations, as part of our commercial record keeping, to resolve disputes, and enforce our agreements.

CHOICE / OPT OUT

You may "opt out" of receiving Varilight's email updates and/or newsletters by clicking the unsubscribe link at the bottom of an email and making the appropriate selections. The choice to opt out of such communications is also generally available during the sign-up process. Following sign-up, we will still send you emails to verify your opt-in including, but not limited to, a registration email, benefit notification emails and emails automatically triggered by actions you took on the website. Generally, you may not opt-out of these communications, which are not promotional in nature. If you wish not to receive them, you have the option of requesting that we remove you from our database.

PROTECTION OF YOUR PERSONAL INFORMATION

The Personal Information that you provide in connection with the use of the website is protected in several ways.

- Access by you to your ticket via the link that we send you by email or using the tracking ID we supply you and your email address.

- Your Personal Information resides on secure servers that only selected Varilight personnel and contractors have access to via a password.

- Your Personal Information is encrypted whenever it is transmitted to Varilight.

We strive to protect the Personal Information submitted to us, both during transmission and once we receive it. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. While we take into account the sensitivity of the Personal Information we collect, process and store, and the current state of technology to use these measures protect your Personal Information, we cannot guarantee its absolute security.

If you have any questions about security on our website, you can send email to us at privacy@varilight.co.uk.

COOKIE AND TRACKING TECHNOLOGIES

The website may automatically collect information as you browse, such as Internet Service Provider, browser type and version, operating system and device type, average time spent on our site(s), pages viewed, information accessed, the Internet Protocol (IP) address used to connect your

computer to the Internet and other relevant statistics. Such information is sometimes referred to as web analytics data.

Technologies such as: cookies, beacons, tags and scripts are used by Varilight and our affiliates, analytics service providers to enhance site features and functionality. These technologies are used in analyzing trends, administering the site, tracking movements around the site and to gather demographic information about our user base as a whole. We may receive reports based on the use of these technologies by these companies on an individual as well as aggregated basis.

• A cookie is a small, unique text file that a website can send to your computer when you visit a site. We may use session cookies, which terminate when a user closes his or her browser, and/or persistent cookies, which remain on the user's computer until manually deleted. Most web browsers can either alert you to the use of cookies or refuse to accept cookies entirely. If you do not want us to deploy cookies to your browser, you can set your browser to reject cookies or to notify you when a website tries to put a cookie on your computer. Rejecting cookies may affect your ability to use the website.

You may choose to engage with us via social media and share information such as messages, photos and videos. Please note that we cannot control the actions of others with whom you may choose to share your pages and information. We do not take responsibility for any information you post to a public bulletin board or chat room, social media website or app. You may be able to remove such information by logging into the said website or application and removing the information or by contacting the appropriate third party application.

CHANGES IN PRIVACY POLICY

Varilight reserves the right to amend this Privacy Policy from time to time at its sole discretion and will provide notice by email or on the home page of the website when we make material changes to this Privacy Policy prior to the change becoming effective. If as the result of such changes, you want to alter the ways in which Varilight is allowed to use your Personal Information, you can do so by following the procedure described in the section entitled "Updating Your Personal Information and Privacy Preferences."

You will be deemed to have been made aware of, and will be subject to, any material changes to the Privacy Policy after such notice has been posted. Notwithstanding changes to our Privacy Policy, we will not alter your stated preferences on how your personal information will be used to communicate with you, either by Varilight or by third parties without your express consent. However, if Varilight is acquired by or merged with another entity, Varilight may provide to such entity customer information that is related to that part of our business that was sold to or merged with the other entity without your consent, but Varilight will provide notice of such asset sales, acquisitions, or mergers on this website.

LINKS TO THIRD PARTY SITES

Our website includes links to other websites whose privacy practices may differ from those of Varilight. If you submit personal information to any of those websites, your information is governed by their privacy policies. We encourage you to carefully read the privacy policy of any website you visit.

SOCIAL MEDIA WIDGETS

Our website may include Social Media Features, such as the Facebook “Like” button and Widgets, such as the Share this button or interactive mini-programs that run on our site. These Features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the Feature to function properly. Social Media Features and Widgets are either hosted by a third party or hosted directly on our website. Your interactions with these Features are governed by the privacy policy of the company providing it.

MINORS

We do not intend to solicit or collect Personal Information from anyone under the age of 18. If you are under 18, do not enter information on this site or engage our services. If you believe a child of yours under the age of 18 has entered Personal Information please contact privacy@varilight.co.uk to have the data removed.

PRIVACY COMPLAINTS

Varilight takes the privacy concerns of its customers and website visitors seriously. If you believe that Varilight has not complied with this Privacy Policy with respect to your Personal Information, you may contact the Data Protection Officer at Doyle & Tratt Products Ltd, Carylls Lea, Faygate, West Sussex, RH12 4SJ, United Kingdom. In your letter please describe in as much detail as possible the ways in which you believe that the Varilight Privacy Policy has not been complied with. We will investigate your complaint promptly.

If you are not satisfied with a way a complaint you make in relation to your data is handled by us, you may refer your complaint to the relevant data protection authority. For UK, this is the Information Commissioner’s Office (ICO). The ICO’s contact details can be found on their website: www.ico.org.uk

If you have any questions about this Privacy Policy, the practices of this website, or your interactions with this website, you can contact our Data Protection Officer at privacy@varilight.co.uk.