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Privacy and cookies policy notice

1. Introduction

- 1.1. This website belongs to It Becomes Fluid Ltd (“we”, “us” or “our”) – you can find our full details [here](#).
- 1.2. It Becomes Fluid respects your privacy and is committed to protecting your personal data. This notice explains how we collect your personal data when you visit our website, how we use your personal data and the legal rights you have in relation to the personal data we collect from you.
- 1.3. It is important that you read this notice so that you are fully aware of how and why we are using your data.

2. Controller

- 2.1. For the purposes of the data protection laws in force in the UK and EU, It Becomes Fluid is the ‘controller’ responsible for any personal data collected from you during your visits to our website. This means that only we (and no other third parties) decide the reasons for collecting personal data from you and the means of how we do so.
- 2.2. If you have any questions about this privacy notice, including any requests to exercise your legal rights (see below), please contact us on (+44)1603 404733 or at privacynotice@itbecomesfluid.com

3. What personal data do we collect?

- 3.1. Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (i.e. anonymous data).
- 3.2. We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:
 - 3.2.1. **Identity Data** includes first name, last name, username or similar identifier, title, date of birth and gender.
 - 3.2.2. **Contact Data** includes billing address, delivery address, email address and telephone numbers.
 - 3.2.3. **Financial Data** includes bank account and payment card details.
 - 3.2.4. **Transaction Data** includes details about payments to and from you and other details of services you have purchased from us.
 - 3.2.5. **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in

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types and versions, operating system and platform and other technology on the devices you use to access this website.

3.2.6. **Usage Data** includes information about how you use our website and services.

3.2.7. **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

4. How do we collect information from you?

4.1. We use different methods to collect personal data from and about you including through:

4.1.1. **Direct interactions:** you may give us your personal data by filling in enquiry forms on our website or by corresponding with us.

4.1.2. **Automated technologies or interactions:** as you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies (see paragraphs 7 and 8 below) and other similar technologies.

4.1.3. **Third parties or publicly available sources:** we receive personal data about you from various third parties and public sources, including analytics providers and search information providers.

5. Why do we collect your personal data?

5.1. We collect the personal data described at paragraph 3 above for the following purposes:

5.1.1. to supply services to you in accordance with any contract which we have with you;

5.1.2. to process any payments you might make for our services;

5.1.3. to provide you with information about our services that you have requested from us;

5.1.4. to manage our relationship with you including any notifications regarding changes to our terms and conditions or this privacy policy;

5.1.5. to administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data);

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- 5.1.6. to deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you; and
- 5.1.7. to use data analytics to improve our website, services, marketing, customer relationships and experiences.

6. The legal bases for using your personal data

- 6.1. The legal bases on which we rely to use your personal data for the purposes described at paragraph 5 above include:
 - 6.1.1. **Contract:** to properly perform any contracts we have with you.
 - 6.1.2. **Legitimate interests:** the processing of your personal data is necessary for our legitimate interests including to recover payments from you, study how customers use our services, develop our services, operate our business, network security, prevent fraud and inform our marketing strategy.
 - 6.1.3. **Legal obligations:** the processing of your personal data is necessary to comply with our legal obligations.
- 6.2. Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you or sharing your personal data with third parties for marketing purposes. We will ask for your express opt-in consent before we share your personal data with any third party business for marketing purposes.

7. What is a cookie?

- 7.1. A cookie is a small text file implanted by a website provider on the hard disks of visitors to a website. Cookies collect information about internet users, such as their names, addresses, e-mail details, passwords and user preferences. They are often used to make websites work, or work more efficiently, as well as to provide information to the website owners. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit <http://www.aboutcookies.org>

8. What cookies do we use and why?

- 8.1. We use the following cookies for the reasons set out below:
 - 8.1.1. **Strictly necessary cookies:** these are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.

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- 8.1.2. **Analytical/performance cookies:** these allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
 - 8.1.3. **Functionality cookies:** these are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences.
- 8.2. You can choose to accept or decline cookies. You will be prompted to accept or decline our cookies when you first visit our website. Most Web browsers automatically accept cookies, but you can modify your browser settings to decline cookies if you prefer. This may prevent you from taking full advantage of our website and some of the functionality of our website.

9. **Disclosure of your information**

- 9.1. We may have to share your personal data with third parties for the purposes set out in paragraph 5 above or where we are required to do so to comply with our legal obligations. Those third parties include:
- 9.1.1. business partners, suppliers and sub-contractors engaged in connection with the performance of any contract we enter into with you;
 - 9.1.2. analytics, including Google Analytics (please see below), and search engine providers that assist us in the improvement and optimisation of our website;
 - 9.1.3. third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets; and
 - 9.1.4. any court, regulator or other law enforcement agency.
- 9.2. With the exception of those listed in paragraph 9.1.4 above (i.e. law enforcement agencies), we require all third parties we engage to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.
- 9.3. We share data with Google Analytics; a Web analytics service which allows us to count the number of visitors to our website and to see how visitors move around our website when they are using it. Although the data we share with Google Analytics is anonymised, in some cases, it might be possible to identify an individual from that data.

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9.4. Google Analytics is based in the U.S. and is therefore outside of the European Economic Area (EEA). Google Analytics is subject to the EU-US Privacy Shield Framework which enables both us and Google Analytics to comply with EU data protection requirements when transferring personal data from the EU to the US. To find out more about the EU-US Privacy Shield Framework, visit <https://www.privacyshield.gov/welcome>. To find out more about Google Analytics, visit <https://www.google.com/analytics/>.

10. Data security

10.1. We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

10.2. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

10.3. We do not transfer your personal data outside the EEA, other than in relation to the data we might share with Google Analytics (please see above). With the exception of the data shared with Google Analytics, the data that we collect from you will only be stored and processed in the EEA.

11. Data retention

11.1. We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

11.2. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

12. Changes to this policy

12.1. This policy may be updated from time to time. You may wish to check it each time you submit personal information to our website. The date of the most recent revisions will appear on this page. If material changes are made to this policy, we will notify you by placing a prominent notice on our website.

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13. Your legal rights

13.1. Under certain circumstances, you have the following rights under data protection laws in relation to your personal data:

- 13.1.1. **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- 13.1.2. **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- 13.1.3. **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law.
- 13.1.4. **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes.
- 13.1.5. **Request restriction** of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- 13.1.6. **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format.
- 13.1.7. **Withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent.

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- 13.1.8. **Complain** to the Information Commissioner (<http://www.ico.gov.uk/>) if you have any concerns in respect of our handling of your personal data. It Becomes Fluid is registered with the Information Commissioner's Office under registration number Z9448857.
- 13.2. If you wish to exercise any of the rights set out above, please contact us on the details given in paragraph 2.2 of this notice.