

# Privacy Policy

## 1 - COLLECTION OF PERSONAL DATA

1.1 – Exito Partners Limited as owner of [www.epliquid.com](http://www.epliquid.com) ("Exito Partners" or we) will only use personal data in accordance with the provisions set out in this Privacy Policy, which is drafted to accord with the Data Protection Act 1998 ("the Act") and the Privacy and Electronic Communications Regulations 2003.

1.2 - For the purposes of the Data Protection Act 1998, Exito Partners is a data controller and is listed in the Register of Data Controllers under number ZA319024. The Register of Data Controllers can be accessed through the website [www.ico.org.uk](http://www.ico.org.uk). This Privacy Policy sets out the basis on which any personal data you provide to us will be collected and processed, the purposes of such processing and how we safeguard your personal data.

1.3 - When you visit the Exito Partners web site (the "Site"), Exito Partners may collect and process personal information about you. This could include but is not limited to, your full name and contact details, your email address, your correspondence address, your user name, or password. Such collection and processing could occur, for example:

1.3.1 - when you register, log in or complete other online forms;

1.3.2 - when you respond to requests to submit personal information about yourself (if any);

1.3.3 - when you otherwise contact us and we keep a record of that correspondence.

## 2 - USE OF PERSONAL DATA

2.1 - Exito Partners may use information to conduct our business with you, including to identify your requirements, to deliver services and information, and to promote other services which may be of interest to you.

2.2 - We may also use it to contact you for your views on our services and to notify you occasionally about important changes or developments to the Site or to our services, unless you have opted out of this as set out at paragraph 8.2 below.

2.3 - The personal information 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 by a supplier with

such staff. By submitting your personal details you agree to us potentially transferring, storing and processing your personal information in this way.

### **3 - DISCLOSURE OF INFORMATION**

3.1 - Exito Partners takes all reasonable care to prevent any unauthorised access to your personal data.

3.2 - We may disclose your personal information to:

3.2.1 - any member of our group (if applicable), which means any subsidiaries or an ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006;

3.2.2 - our affiliates or professional advisers; or

3.2.3 - (where we need to do so) to persons or organisations who work on our behalf to provide a product or service to you. Such persons or organisations may only use this information in order to provide such products or services and not for any other purpose.

3.3 - We may share or sell, as permitted by law, information to other companies who we believe may have products and services of interest to you. If you do not wish to receive information from us or from other sources, please follow the instructions at paragraph 8.2 below.

3.4 - We may also share such information about our visitors, customers or former customers to companies that perform marketing services on our behalf or with whom we have joint marketing agreements.

### **4 - HOW WE PROTECT YOUR DATA**

4.1 - If you are registering on-line with us in any context we will send you a confirmation e-mail containing your log-in details. It is your responsibility to protect your log-in details. You must not share or disclose your log-in details to any other party.

4.2 - Exito Partners takes all reasonable care to ensure the security of the Site and your personal information from access by unauthorised persons and from unlawful processing, accidental loss, destruction and damage. We will not share your information other than as provided for in this Privacy Policy or as required by law, by court order or by any relevant government or law enforcement authority.

4.3 - The internet is not a secure medium. We cannot guarantee the security of your information absolutely and you acknowledge that we may be subject to breaches of security through no fault of our own.

## **5 - COOKIES**

5.1 - Exito Partners may track and process information and data in relation to your use of the Site using "cookies". A cookie is a small file which is sent to your browser and stored on your computer's hard disc, which helps us to understand and track your use of the Site and to improve the information and services provided.

5.2 - We use cookies solely to gather information on IP addresses and pages visited, to analyse trends, administer the Site, track users' movements on the Website and gather broad demographic information for aggregate use. IP addresses will not be used to deliver targeted marketing messages.

5.3 - We do not disseminate this information to anyone but Exito Partners' partners, employees and contractors. Most internet browsers allow you to stop receiving cookies via options or settings. You may enable these options or settings but this may mean that our system cannot recognise your computer when you log in and you may not be able to use or access certain parts of the Site.

5.4 - For information about cookies generally, please visit [www.allaboutcookies.org](http://www.allaboutcookies.org) or see our 'Cookies Policy' in details.

## **6 - LINKS TO OTHER WEBSITES**

6.1 - The Site may contain links to other websites. This Privacy Policy extends only to the Site and does not cover the use of data by any website not connected to us which you may link to by using hypertext links within the Site.

6.2 - We recommend that you check the relevant privacy policy of each Site that you visit and contact the owner or operator of that website if you have any concerns.

## **7 - CHANGES**

7.1 - We may edit or amend this Privacy Policy from time to time. We reserve the right to modify it without notice and in our sole discretion at any time by updating this web page.

7.2 - As a result of improvements we make to our services, amendments to laws or regulation or developments in the technology or processes we use, we may change the information we hold about you and/or the way in which or the purposes for which we process such information.

## **8 - CONTACT/UNSUBSCRIBE**

8.1 - Questions, comments and requests regarding this Privacy Policy are welcomed and should be addressed to [info@exitopartners.com](mailto:info@exitopartners.com)

8.2 - From time to time, Exito Partners or third parties who we think have products or services of interest to you may send you e-mails, e-mail newsletters, or news updates alerting you to new features, products, promotions, or services pertaining to the Site. If you no longer wish to receive materials from us and/or from such third parties, you may opt-out of receiving these communications by writing to us at 80 Fleet Street, London EC4Y 1EL or by emailing your request to 'unsubscribe' to [info@exitopartners.com](mailto:info@exitopartners.com).