



PRIVACY POLICY STATEMENT

Terms of this Agreement

On completing the registration to join the mailing list of The Onoto Pen Company Limited or by viewing this website (www.onoto.com), you (the user) agree to the terms and conditions set out below. This Agreement is for an indefinite term. Either party can terminate for any reason at any time. No notice is required for termination.

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Delivery of Service & Force Majeure

The Onoto Pen Company Limited shall have no liability to you for any interruption or delay in access to the site irrespective of the cause. The Onoto Pen Company Limited or their agents make no warranty that the site will be available for access at any time.

PRIVACY POLICY

The Onoto Pen Company Limited is committed to protecting your privacy online. Our policy explains how we will do this. We will review this policy in the light of comments we receive so please check the latest version. If you have any questions please contact us. We will ensure that our staff and those acting on our behalf obtain, use and disclose personal information lawfully and correctly. To this end we fully endorse and adhere to the principles of data protection, as set out in the General Data Protection Regulation 2018 (GDPR). We shall apply the GDPR principles globally.

In particular we will:

- Observe the conditions in the GDPR regarding the fair collection and use of personal information (please see below regarding personal information collected via our website)
- Meet our legal obligations to specify the purposes for which we process personal information, this information being set out in our data protection notification particulars which can be found on the Information Commissioner's website at www.dpr.gov.uk

What information do we collect?

- We collect names, email addresses, contact numbers, postal addresses and purchase history.
- Registration: To receive our newsletter or details of our products, we ask you to register, and if you do we ask for your name and email address.
- From time to time we may ask you for further information, for example if you enter a competition or purchase online.
- We may also use cookies. For an explanation, see the section on cookies below.
- We do not store credit card information.

Who collects your information?

We collect your information, and are the Data Controller for that information, for the purposes of fulfilling your order, or for subscribing you to our mailing list.

What is the legal basis for processing your data?

We process your information to enable us to fulfil your order and in performance of our contract for goods, as well as in our legitimate interests in the operation of a retail company.

How will your data be used?

We will use your data to process your orders, undertake any statistical sales analysis, arranging deliveries, and for contacting you about our products and offers.

How long will your data be stored by us?

We will store and use your data for as long as Onoto is actively trading, we will securely store your data unless you request that your data is erased.

Will your data be shared with third parties?

Your privacy is important to us and so we will never sell or disclose your personal information to a third party for the use of the information for other purposes than described in this policy.

We may give your personal information to our trusted service partners for delivering services to you. For instance, for the purposes of marketing, finance, advertising, processing payment and delivery ('Data Processors').

We will make sure that your personal information is protected when it is sent outside of Onoto. We ensure our trusted service partners keep your personal information safe and uphold the required Data Protection Policies.

What rights do you have as a 'Data Subject'?

You have the right to:

- be informed that we hold data about you;
- access to the data we hold about you;
- have your data rectified;
- have your data erased;
- restrict the processing of your data;
- data portability;
- object.

How can you, as the 'Data Subject', raise a complaint?

If you are concerned about the processing and use of your Data, please contact us at info@onoto.com and we will investigate your concerns. If you still have concerns following the results of that investigation, you can contact the regulatory body, The Information Commissioner's Office (<https://ico.org.uk/concerns/>).

COOKIE POLICY

Please read the following information to help you understand the use of cookies on our website and how they help improve your experience of using our site.

What are cookies?

Our website uses cookies, as almost all websites do, to help provide you with the best experience we can. Cookies are small text files that are placed on your computer or mobile phone when you browse almost all websites.

Granting us permission to use cookies

If the settings on the software that you are using to view this website (your browser) are adjusted to accept cookies, we interpret this, and your continued use of our website, to mean that you are happy for us to use cookies. Should you wish to remove or not use cookies from our site you can learn how to do this below. However, doing so will mean that our site will not work as you might expect.

Why we use cookies

Our cookies help us to:

- Make our website work as you'd expect Improve the speed/security of the site
- Continuously improve our website for you
- Make our marketing more efficient (ultimately helping us to offer the service we do at the price we do)

We do not use cookies to:

- Collect any personally identifiable information (without your express permission)
- Collect any sensitive information (without your express permission)
- Pass data to advertising networks Pass personally identifiable data to third parties
- Pay sales commissions

We also use cookies to make our website work including:

Making our shopping basket and checkout work and allowing you to add comments or testimonials on our site. There is no way to prevent these cookies being set other than to stop using our site.

You can learn more about the different types of cookies we use below:

Anonymous Visitor Statistics Cookies

We use these cookies to compile visitor statistics such as how many people have visited our website, what type of technology they are using (e.g. Mac or Windows which helps to identify when our site isn't working as it should for particular technologies), how long they spend on the site, what page they look at etc. This helps us to improve our website. These so called “analytics” programs also tell us if, on an anonymous basis, how you arrived at our site (e.g. from a search engine, a link on another website or from an email we sent to you) and whether you have visited us before. This helps us to understand what you are looking for – and allows us to direct you more efficiently around our site.

Third party functions

Our site, like most websites, includes functionality provided by third parties. A common example is an embedded YouTube video. Our site includes the following which use cookies:

Onoto.com Cookies

Language	So that the site content is delivered in the correct language (UK English, not American)
Session	Follows your progress when, for example, filling in a review
Anon	Allows us to show tailored information to people who are not logged in
Currency Code	Tells us which currency you selected for payment
Third party cookies	Where a cookie is set to help them work more efficiently: Louder Voice – so you can leave a review Facebook YouTube <u>Paypal</u> MCSSL and 1Shoppingcart.com- our shopping cart
Google Analytics	Tells us which pages have been visited but it does not record any personally identifiable information

Disabling these cookies is likely to disrupt the functions offered by these third parties.

Turning Cookies Off

You can usually switch cookies off by adjusting your browser settings to stop it from accepting cookies (Learn how here). Doing so however is likely to limit the functionality of your browsing experience as cookies are a standard part of most modern websites – including ours. It may be that you have some concerns around cookies, thinking of them as "spyware". Rather than switching off cookies in your browser you may find that anti-spyware software achieves the same objective by automatically deleting cookies considered to be invasive. Learn more about managing cookies with anti-spyware software here. The cookie information text on this site is derived from content provided by Attacat Internet Marketing (<http://www.attacat.co.uk>) a marketing agency based in Edinburgh. If you need similar information for your own website you can use their free cookie audit tool.

How do we use your information?

We use the information to help us understand more about how our web site is used, to improve our site, and to send you information about our products and services that we think may be of interest to you, both electronically and otherwise. In the case of our online publications available through subscription, your personal information may be used to enable us to verify you are a subscriber and to deliver the online publication to you.

When do we share information?

We never sell or give your personal information to others. A number of other people's web sites may have links on our site. If you link to their sites, they may collect information, and such sites are not within our control and are not covered by this privacy statement. If we believe that your use of onoto.com is unlawful or damaging to others, we reserve the right to disclose the information we have obtained through the site about you to the extent that it is reasonably necessary in our opinion to prevent, remedy or take action in relation to such conduct.

What about security?

When purchasing online, all personal and any credit card information is encoded using Secure Sockets Layer (SSL) technology before being sent over the Internet. To protect your data further, credit card transactions are issued with a digital certificate, ensuring that your data can only be read by our transaction system as long as your browser shows its secure mode symbol (such as a key or closed lock). To make the most of the security on our site, we recommend using either Microsoft® Internet Explorer™ version 9.0 or higher, Firefox or Chrome, all of which enable SSL. We also recommend setting your browser's preferences to accept cookies and enable JavaScript™.

English Law

The Agreement will be governed by and construed in accordance with the laws of England and Wales and subject to the exclusive jurisdiction of the courts of England and Wales.

Dated: 1 November 2004 Updated: 30 April 2018