



PRIVACY POLICY

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Introduction

SUNSYNK GROUP LIMITED (“Sunsynk”) respects your privacy and no matter where in the world you are, we are committed to protecting your personal data. This Privacy Policy will inform you about your privacy rights, how we look after your personal data when you visit our website, and how data protection law protects you.

This Privacy Policy sets out how Sunsynk uses and protects your personal data. It is provided to you in a layered format so that you can easily and swiftly click through to the specific areas set out below. Alternatively, you can view the full version of the Privacy Policy [here](#) **OR** download a copy of the Privacy Policy here: <https://www.sunsynk.org/privacy/>

- 1. IMPORTANT INFORMATION AND WHO WE ARE** (paragraph 1)
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1. Important information and who we are

This Privacy Policy gives you important information about how Sunsynk collects and uses your personal data through your use of this website, including any data you may provide when you register with us, interact with us via one of our social media platforms, fill out an online or paper form to register your Sunsynk product warranty, join our mailing list or sign up to receive newsletters, emails or promotional offers, and when you contact us, via email or telephone, for technical assistance or any other general or product queries. **It is important that you read this Privacy Policy so you understand the basis on which we collect your personal information and how we use it.** This website is not intended for children, and we do not knowingly collect data relating to children.

Data Controller

SUNSYNK GROUP LIMITED ("Sunsynk" or "we" or "us" or "our") is registered in England and Wales under company number 15107233 and our registered office is located at Unit 10 Edison Court Ellice Way, Wrexham Technology Park, Wrexham, United Kingdom, LL13 7YT.

We are the parent company of various subsidiaries operating globally in the United Kingdom, Europe, South Africa and elsewhere. This Privacy Policy is therefore issued on behalf of all such companies under the Sunsynk banner and when we mention "Sunsynk", "we", "us" or "our" in this Privacy Policy, we are referring to all relevant companies in the Group responsible for processing your personal data, subject to any additional compliance requirements we undertake to abide by in terms of local data protection legislation and regulations in the jurisdiction in which you reside and make use of our products.

If you have any concerns or questions about this Privacy Policy, including any requests to exercise your legal rights (see paragraph 9), please contact us using the information set out in the contact details section (see paragraph 10).

2. The types of personal data we collect about you

Personal data means any information about an individual from which that person can be identified. We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, any previous names, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes any banking particulars, or financial data contained in letters of credit, credit applications, invoicing, statement of accounts or any other financial documents.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us or one of our approved distributors, installers or resellers.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, device ID and other technology on the devices you use to access this website.

- **Profile Data** includes your username and password, name, address and telephone number, purchases or orders made by you, your blog and forum comments, groups, files, notifications and profile settings.
- **Usage Data** includes information about how you interact with and use our website, products and services. We may also collect usage data from your product/s via our Sunsynk Connect / Sunsynk Connect Pro App. You can access the Privacy Policy for our Sunsynk Connect Pro App [here](#).
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data which is not personal data as it does not directly (or indirectly) reveal your identity. For example, we may aggregate individuals' Usage Data to calculate the percentage of users accessing a specific website feature, thereby facilitating the analysis of general trends in terms of how users are interacting with our website. This is designed to help us improve the website and our service offering.

We do not collect any **Special Categories of Personal Data** about you. This includes details about your race or ethnicity, religious beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data, and information about criminal convictions and offences.

3. **How is your personal data collected?**

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

- **Your interactions with us.** You may give us your personal data by filling in online forms, engaging with us via social media platforms, or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - Register your interest in our products;
 - Register your product for warranty coverage
 - create an account/profile on our website;
 - interact with us on social media;
 - join our mailing list;
 - contact us for technical queries or support
 - register to use our mobile App, Sunsynk *Connect* / Sunsynk *Connect Pro*

- enter a competition or participate in a promotion or survey;
 - request product/distributor/installer information be sent to you;
 - write to us, call or email us with comments, complaints, or suggestions.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.
 - **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources in connection with the provision of our services.

4. How we use your personal data

Legal basis

Data protection laws in the United Kingdom, the European Union, South Africa and other jurisdictions in which we operate, require us to have a legal basis for collecting and using your personal data. We rely on one or more of the following legal bases:

- **Performance of a contract with you:** Where we need to perform the contract we are about to enter into or have entered into with you.
- **Legitimate interests:** We may use your personal data where it is necessary to conduct our business and pursue our legitimate interests, for example to prevent fraud and enable us to give you the best and most secure customer experience. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

Legal obligation: We may use your personal data where it is necessary for compliance with a legal obligation that we are subject to. We will identify the relevant legal obligation when we rely on this legal basis.

- **Consent:** We rely on consent only where we have obtained your active agreement to use your personal data for a specified purpose, for example if you subscribe to an email newsletter. We will obtain your consent before sending you any marketing

communications via email or text messages and you have the right to withdraw your consent to marketing at any time by contacting us to let us know that you no longer wish to receive such communications.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use the various categories of your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Purpose/Use	Type of data	Legal basis and retention period
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you. Whenever we collect or process your personal data, we will only retain this data for as long as you remain our customer and we provide you with any assistance, information or services related to your product/s, including after sales service or warranty coverage and other interactions.
To process and deliver your order or repair services including: (a) Management of payments, fees and charges (b) Collection and recovery of money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Profile (f) Usage	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us) Whenever we collect or process your personal data, we will only retain this data for the duration of our relationship with you and in this instance, for the fulfilment of legal and tax obligations. The retention period for financial records will be governed by the legal, regulatory, tax, accounting

		and reporting requirements in the jurisdiction in which you live and make use of our products.
To manage our relationship with you which will include: (a) Registering product warranties and providing after sales support. (b) Maintaining your Sunsynk Connect Pro account and delivering products and services related to the App including associated administration and support. (c) Notifying you about changes to our trading Terms and Conditions, Terms of Use Privacy Policy or other Policies. (d) Notifying you about products including new releases, the discontinuation or recall of products, firmware updates etc. (e) Dealing with your requests, complaints and queries	(a) Identity (b) Contact (c) Transaction (d) Profile (e) Usage (f) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and manage our relationship with you We will retain this data only for as long as necessary to fulfil the purposes for which it was collected and processed and for proper internal administration, contract management and record keeping.
To enable you to partake in special events, competitions or complete surveys	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products, rate our after sales service, and to boost brand awareness, all of which serve to

		facilitate the development and growth of our business) We will retain this data only for as long as it is relevant to fulfil the purposes for which it was collected and processed.
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical (d) Profile (e) Usage	(a) Necessary to comply with a legal obligation (b) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) We will retain this data for as long as it is relevant to fulfil the purposes for which it was collected and processed.
To deliver relevant website content and online advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy) We will retain this data for as long as it is relevant to fulfil the purposes for which it was collected and processed
To use data analytics to improve our website, products/services, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to

and to measure the effectiveness of our communications and marketing		develop our business and to inform our marketing strategy) We will retain this data for as long as it is relevant to fulfil the purposes for which it was collected and processed
To send you relevant marketing communications and make personalised suggestions and recommendations to you about goods or services that may be of interest to you based on your Profile Data	(a) Identity (b) Contact (c) Technical (d) Profile (e) Usage (f) Marketing and Communications	(a) Consent, having obtained your prior consent to receiving direct marketing communications (b) Necessary for our legitimate interests (to carry out direct marketing, develop our products/services and grow our business) OR We will retain this data for as long as it is relevant to fulfil the purposes for which it was collected and processed or until you revoke your Consent.

Direct marketing

During the registration process on our website when your personal data is collected, you will be asked to indicate your preferences for receiving direct marketing communications from Sunsynk via email or sms. You may also receive marketing communications from us if you have requested information from us or purchased goods or services from us and you have not opted out of receiving related marketing. We may also analyse your Identity, Contact, Technical, Usage and Profile Data to form a view which products, services and offers may be of interest to you so that we can then send you relevant marketing communications.

Third-party marketing

We will get your express consent before we share your personal data with any third party for their own direct marketing purposes.

Opting out of marketing

You can ask us to stop sending you marketing communications at any time by following the opt-out links within any marketing communication sent to you.

If you opt out of receiving marketing communications, you will still receive service-related communications that are essential for administrative or customer service purposes (for example relating to product orders, confirmation of warranty registration, updates to our Terms and Conditions, checking that your contact details are correct etc).

Cookies

For more information about the cookies we use and how to change your cookie preferences, please see our Cookie Policy.

5. Disclosures of your personal data

We may share your personal data with carefully selected parties but only for the purposes set out above. In addition, we may share your personal data with third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Privacy Policy. We require all third parties to respect the security of your personal data and to treat it in accordance with the data protection law applicable in the jurisdiction in which you reside and make use of our products. 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.

6. International data transfers

As a multinational company with certain centralised functions, we may share your personal data within the Sunsynk Group and this may involve cross border transfers of your data. Whenever we transfer your personal data outside of the UK, to countries which have laws that do not provide the same level of data protection as the UK law, we always ensure that a

similar degree of protection is afforded to it by ensuring that at least one (or more) of the following safeguards are implemented:

- We will only transfer your personal data to countries that have been deemed by the UK to provide an adequate level of protection for personal data by the European Commission.
- We may use specific standard contractual terms approved for use in the UK which give the transferred personal data the same protection as it has in the UK, by means of an International Data Transfer Agreement.

If you have any questions related to international data transfers, please contact us at [insert contact email address or link to Contact details in paragraph 1].

7. Data security

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.

We have also 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.

8. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may also retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect of our relationship with you.

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,

whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

By law we must keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see section paragraph 9 below for further information. In some circumstances we will also anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

9. Your legal rights

You have a number of rights under data protection laws in relation to your personal data.

You have the right to:

- Request access to your personal data (commonly known as a "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.
- 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.
- Request erasure of your personal data in certain circumstances. 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. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) as the legal basis for that particular use of your data. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your right to object.
- You also have the absolute right to object at any time to the processing of your personal data for direct marketing purposes (see **OPTING OUT OF MARKETING** in paragraph 4 for details of how to object to receiving direct marketing communications).

- 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. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- 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 withdrew your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in one of the following scenarios:
 - If you want us to establish the data's accuracy;
 - Where our use of the data is unlawful but you do not want us to erase it;
 - 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
 - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

If you wish to exercise any of the rights set out above, please contact us on policyqueries@sunsynk.com

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any other rights above). However, we may charge a reasonable fee if your request is unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no

right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within thirty (30) days. Occasionally it could take us longer than a month if your request is particularly complex or you have made several requests. In this case, we will notify you and keep you updated.

10. Contact details

If you have any questions about this Privacy Policy or about the use of your personal data or want to exercise your privacy rights, please contact us on: policyqueries@sunsynk.com

Complaints

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). You may also refer a complaint to the appropriate regulator in the jurisdiction in which you reside and make use of our products. We would, however, appreciate the chance to deal with your concerns before you approach the ICO (or any other regulator) so please contact us in the first instance.

11. Third-party links

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.