

affordable process control software for the aviation MRO industry



Tracware Limited  
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## **Tracware's Privacy Policy**

Here at Tracware, looking after the personal data that you share with us is extremely important both to your and the wider business. We would like to share with you how we use your data and, also to explain how we secure your personal data.

### **1 About this Privacy Policy**

This Privacy Policy, which may be updated from time to time, sets out the types of personal data that we collect and explains how and why we use your personal data. It explains when and why we share personal data within Tracware and with other organisations, and we also set out your rights when it comes to your personal data.

This Privacy Policy applies to you if you use our products and services or interact with us, both directly via any of our websites, including our "aeropartslocator" portal ("our Websites"), or our social media accounts ("our Social Accounts").

If you are the lead enquirer or "single Point of Contact", you are responsible for ensuring that the other members of your company are aware of the content of this Privacy Policy and are in agreement with you supplying their personal data to us to resolve any issue on their behalf.

### **2 Personal Data We May Collect**

Tracware Limited is the Data Controller for the purposes of the Data Protection Act 1998 and the General Data Protection Regulation.

When you engage in a contract for any of our Products & Services and use our Websites, for example when registering a Change Request, you may provide us with:

- Your Company, and or your Personal details, including your postal and billing addresses, email addresses, phone numbers and in the case of Suppliers, your bank details.

When you enquire with Tracware about procuring our software, you may provide us with:

- Your personal details, including your postal and billing addresses, email addresses, phone numbers and date of birth and name
- Information about your previous purchases of similar products
- Depending on your method of communication, we may keep a recording of your email or telephone call

## Privacy Policy

TW18049

When you place an order with Tracware, you may provide us with:

- Your personal details, including your postal and billing addresses, email addresses, phone numbers and date of birth and name
- Financial transaction information, including your bank information
- Travel related information such as passport details, ethnicity, visa eligibility
- In some cases, we may also need to collect more sensitive personal data such as information concerning medical conditions, disabilities and special requirements

When you contact us, or we contact you to; place an order, take part in any promotions, competitions, surveys or questionnaires about our services, we may collect:

- Personal data you provide about yourself anytime you contact us about our services (for example, your name and contact details), including by phone, email or post or when you speak with us through social media
- Details of the emails and other digital communications we send to you that you open, including any links in them that you click on
- Your feedback and contributions to Customer surveys and questionnaires
- Any digital assets, such as images, videos, or emails you provide to us as part of those promotions

We may also use personal data from other sources such as specialist companies that supply information, online media channels, our supplier partners and public registers. For example, this other personal data helps us to:

- Review and improve the accuracy of the data we hold
- Improve and measure the effectiveness of our marketing communications, including online advertising

When you interact with us via our Social Accounts, we may collect:

- Social media content such as imagery, video content and feedback such as reviews and social interactions
- For any content you submit, we may use, copy, modify, adapt, publish or incorporate such content into forms of marketing messaging and advertising for our social accounts, email marketing, print brochures, direct mail, and our website
- We may also request personal data such as contact details and location in order to process enquiries through to our Support Engineers. This data will not be used for any other purpose

When you use our website we use data tracking software ('Cookies') which allow us to collect:

- Information about your online browsing behaviour on our Websites and Mobile Apps and information about when you click on one of our adverts (including those shown on other organisations' websites)
- Information about any devices you have used to access our Services (including the make, model and operating system, IP address, browser type and mobile device identifiers)

## 3 How We Use Personal Data

We use personal data to effectively manage and improve the services we offer to you, including:

- Processing site visits, so that we can manage the provision of services
- Improve our online services, including improving our Websites and our Mobile app (see Cookies & Technology section)
- Detection and prevention of fraud or other crimes, so that we can ensure you can safely use our services
- Improvement and development of our products and Suppliers, information technology systems and the way we communicate with you, including measuring the responses to certain products
- Providing a specialised and personalised service to you to help us meet your needs as a Customer, including providing you with marketing material that is relevant to your interests. This may include us measuring your responses to marketing communications
- Contact and interaction with you, for example by phone, email or post or by responding to social media posts that you send to us, so that we can service your query effectively as a Customer

## 4 Sharing Personal Data

We may share the personal data we collect with other companies in the Tracware Group, where it is necessary for the effective servicing of a query.

We may share the personal data we collect with other Supplier Partners and Service Providers. We only share personal data that enables our Supplier Partners to provide their services. We work with carefully selected Service Providers that carry out certain functions on our behalf, including, for example, companies that help us with our technology services, storing and combining data, and processing payments. We only share personal data that enables our Service Providers to effectively provide their services. When we share personal data with these companies we require them store and process it securely, and they must not use your personal data for their own marketing purposes.

We may also need to share personal data with other organisations in certain circumstances:

- if the Law or a Public Authority says we must share the personal data
- if we need to share personal data in order to establish, exercise or defend our legal rights (this includes providing personal data to others for the purposes of preventing fraud and reducing credit risk)
- to an organisation we sell or transfer (or enter into negotiations to sell or transfer) any of our businesses or any of our rights or obligations under any agreement we may have with you. If the transfer or sale goes ahead, the organisation receiving your personal data can use your personal data in the same way as us
- to any other successors in title to our business

The personal data 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 companies operating outside the EEA who work for us or for one of our Service Providers, such as airlines, hoteliers, insurance companies and ground handling agents so they can provide you the arrangements you require.

We may be required to disclose certain of your personal data to government bodies or other authorities in the UK and in other countries, such as those responsible for immigration, border control, security and anti-terrorism. Even if it is

## Privacy Policy

TW18049

not mandatory for us to provide information to such authorities, we may exercise our discretion to assist them where appropriate.

### 5 Protection of Personal Data

The protection and safe-guarding of your personal data is very important to us and we implement various security safeguards to protect your data, including:

- Encryption, such as the use of Transport Layer Security (TLS) where personal data is transferred over the internet.
- Regular reviews of our processes for collecting, storing and processing your personal data.
- Restricting access to your personal data to authorised users. This includes the use of physical security measures.

However, whilst we take appropriate technical and organisational measures to safeguard your personal data, please note that we cannot guarantee the security of any personal data that you transfer over the internet to us.

### 6 Marketing

We may send you relevant news and offers about our products and services in a number of ways, including by email and occasionally, personally by phone, but only if you have previously agreed to receive these marketing communications or have engaged with us in a service provision way.

We may also wish to contact you about your views to help us improve our products and services, so we may contact you for market research purposes. You can choose not to take part in our market research.

### 7 Your Rights

Under the Data Protection Act 1998 and the General Data Protection Regulation, you have the right to see the personal data we hold about you. This is called a Subject Access Request. If you would like a copy of the personal data we hold about you, or would simply like to ask any questions about how we collect, store and use personal data, please write to:

The Managing Director  
Tracware Limited  
PO Box 79  
**RYDE**  
**PO33 2WF**  
**UK**

You can also email us at [info@tracware.co.uk](mailto:info@tracware.co.uk)