



## WEBSITE PRIVACY POLICY

Acrow Global Limited (hereinafter “Acrow” “we,” “our,” or “us”) is committed to safeguarding and handling your Personal Information in a responsible and secure manner.

This Website Privacy Policy describes how we process your Personal Information as you use our website located at <https://acrowbridge.co.uk/> and any other website, services, tools, technology, products, features, and mobile apps (together, the “Services”) provided, operated or owned by Acrow. When we collect, access, use or do anything with your Personal Information, we are “processing” your Personal Information.

We may modify this Policy at any time, without prior notice, and changes may apply to any Personal Information we already hold about you, as well as any new Personal Information collected after the Policy is modified. If we make changes, we will notify you by revising the date at the top of this Policy. We will provide you with advanced notice if we make any material changes to how we collect, use or disclose your Personal Information or that impact your rights under this Policy. If you continue to access or use our Services after receiving the notice of changes, you acknowledge your acceptance of the updated Policy.

In addition, we may provide you with real time disclosures or additional information about the data handling practices of specific parts of our Services. Such notices may supplement this Policy or provide you with additional choices about how we process your Personal Information.

### Section 1 - Information We Collect Through Your Use of the Services

Personal Information is any information that identifies you or makes you identifiable. We collect different types of Personal Information when you’re accessing or using our Services, including:

- **Information you provide to us:** In connection with the Services, we may ask you to provide these categories of Personal Information:
  - **Self-Reported Information:** Information you provide about yourself, including your contact information, employer, location, or any other data you submit while using our Services.
  - **Voluntary Information:** Information you provide to us voluntarily by completing web forms, participating in polls, or contributing to blogs, postings, contacting customer service, and other mediums constitutes Voluntary Information.
- **Usage Information automatically collected.** When you use the Services, we automatically collect information about the Services you use and how you use them (“Usage Information”), as described below.
  - **Service Data:** We collect information about your interactions with the Services, such as the pages or other content you view, and other actions you perform while using the Services.
  - **Log Data:** We automatically collect log information when you use the Services. This might include your IP address, access times, hardware and software information, device information, device event information (e.g. crashes, unsuccessful logins, browser type), the web page you’ve viewed or engaged with before or after using the Services, and other relevant information. We collect and monitor this data in order to keep track of the security and privacy of your account.
  - **Cookies and Similar Tracking Technologies:** We may use various tracking technologies to collect and store information about your use of our Services. We use these tools to ensure that you receive a personalised experience, to provide you with certain functions on our Services, to keep your account safe, and to improve and optimise our Services. Please refer to the “Cookies and Similar Tracking Technologies” section below for more information.



## Section 2 - How We Use Your information

Your Personal Information can be used for various purposes, including:

- **To Provide Our Services.** When you access or use our Services, we process certain Personal Information about you to be able to provide you with our Services. We cannot provide you with our Services without such processing of your Personal Information.
- **To Provide You with Service-Related Communications.** If you sign up for our Services or are asked to create an account, you will receive Service-related communications. Our Service-related communications are transactional messages about your account, billing information, surveys, support, customer service, research you may be interested in or are participating in, policy changes, or other Service-related notifications. You can manage your email preferences and opt out of certain communications. However, service-related communications are necessary for us to continue to provide our Services to you.
- **To Enforce our Terms, Agreements, or Policies.** To maintain a safe, secure, and trusted environment for you when you use the Services, we use your Personal Information to make sure our terms, policies, and agreements with you and any third parties are enforced. We actively monitor, investigate, prevent, and mitigate any suspected or actual prohibited activities on our Services. We are required to process your Personal Information for this purpose to provide our Services.
- **For Product Research and Development.** We want to ensure our Services are continually improving and expanding so that we meet and exceed your needs and expectations. To do so, we may process your Personal Information to improve, optimise, or expand our Services or features of our Services. We do so by processing information about your use of the Services, any information you provide to us, and by measuring, tracking, and analysing trends and usage in connection to your use or the performance of our Services. Without processing your information for such purposes, we may not be able to ensure your continued satisfaction when using our Services.
- **To comply with applicable laws.** We may be required to process your Personal Information under certain laws and regulations, such as tax laws. We will also process any and all information to law enforcement agencies or others if required to do so by law or in the good faith belief that such preservation or disclosure is reasonably necessary to: (a) comply with legal or regulatory process (such as a judicial proceeding, court order, or government inquiry) or obligations that we may owe pursuant to ethical and other professional rules, laws, and regulations; (b) enforce the Acrow Terms of Service and other policies; (c) respond to claims that any content violates the rights of third parties; or (d) protect the rights, property, or personal safety of Acrow, its employees, its users, its clients, and the public. We cannot provide the Services to you without such processing.

## Section 3 - How We Share Your Information

We may share your Personal Information as follows:

- **Third-Party Service Providers:** We may use third parties to perform certain services on our behalf in connection with the Services such as: fulfilling orders, sending e-mail, removing repetitive information from customer lists, Website analysis, analysing data, providing marketing assistance, processing payments, and providing customer service
- **Opt-in and Opt-out Programmes:** Throughout the Services you may be presented with opportunities to receive mailings from third parties or Acrow. An opt-in/opt-out message may ask you if you would like your information to be shared. If you do choose to have your information shared, please be aware that we are not responsible for the privacy practices of these other companies, and you should review the privacy practices of such companies prior to providing your Personal Information. If you would not like your information to be shared to third parties, or if you would like to stop receiving mailings from third parties or Acrow, you may follow the instructions in the opt-out section below.

# ACROW

- **Acrow Subsidiaries and Affiliates:** We may share your information (including, without limitation, Personal Information) with subsidiaries and affiliates of Acrow.
- **Merger, Bankruptcy, or Corporate Reorganisation:** We may disclose and transfer your Personal Information to a subsequent owner, co-owner, or operator of Acrow or the Services, or in connection with a merger, consolidation, restructuring, the sale of substantially all of our interests and/or assets (i.e., a bankruptcy proceeding), or other corporate change. We will notify you with any choices you may have regarding your Personal Information when we are engaged in a merger, bankruptcy, or corporate reorganisation.
- **Legal Obligations and Safety:** We may share your Personal Information if it is reasonably necessary to:
  - Comply with a valid legal process (e.g., subpoenas, warrants, court orders, etc.);
  - Comply with requests or investigations by public authorities;
  - Comply with applicable laws or regulations;
  - Enforce or apply the Acrow policies or policies of our business partners;
  - Protect the security or integrity of the Services; or
  - Protect the rights, property, or safety of Acrow, our employees or users, partners and affiliates, or other natural persons.

## Section 4 - Your Choices

- **Self-Reported and Voluntary Information:** You may choose not to provide us with some of your Personal Information. For example, you are not required to complete any survey we send to you. In some instances, you may be able to edit your answers to forms, surveys or features you submit to us. Please contact us at [acrowuk@acrow.com](mailto:acrowuk@acrow.com) with your request.
- **Communication Preferences:** If you do not want to receive emails from us, please adjust your communication preferences or click the unsubscribe link within the email you received from us. You will not be able to unsubscribe from Service-related communications as they are necessary for us to continue offering you the Services.

If you are located in the European Economic Area or Switzerland, please refer to the section below entitled, "Notice to Individuals in the European Economic Area and Switzerland" for information about additional choices and rights to your Personal Information.

## Section 5 - Third-Party Services

You may find links to other websites, third party applications, and widgets on our Services that we do not own or control, such as various social media platforms. When you click on links in our Service, they may direct you away from our website. We are not responsible for the privacy practices of other sites and encourage you to read their privacy statements. Once you leave our Service or are redirected to a third-party website or application, you are no longer governed by this Website Privacy Policy or our website's Terms of Service.

## Section 6 - Security

To protect your Personal Information, we take reasonable precautions and follow industry standard practices to make sure it is not inappropriately lost, misused, accessed, disclosed, altered or destroyed.

You should be aware that, unfortunately, no system can be 100% secure. There will always be a risk that your Personal Information gets compromised.



## Section 7 - Cookies and Similar Tracking Technology

Acrow uses cookies and similar tracking technologies to collect Usage Information about your use of our Services. Cookies are small files, typically comprised of letters and numbers, that your computer or mobile device saves when you visit certain websites. When you return to the websites that save cookies on your device—or visit other websites that use the same cookies—the websites recognise such cookies and your browsing device. Generally, we use first-party and third-party cookies for the following purposes:

- To make our Services function properly;
- To provide a secure browsing experience during your use of our Services;
- To collect Usage Information about your use of our Services to help us improve and optimise our Services; and
- To remember your preferences for your convenience.

**Types of Cookies on Our Services.** We use the following types of first- and third- party cookies on our Services:

- **Strictly Necessary Cookies:** These cookies are essential because they enable you to move around and use our Services. Without these cookies, some services cannot be provided. This category of cookies is essential for our Services to work and they cannot be disabled.
- **Functional Cookies:** We use functional cookies to remember your choices so we can tailor our Services to provide you with enhanced features and personalised content. While these cookies can be disabled, this may result in less functionality during your use of our Services.
- **Performance or Analytic Cookies:** These cookies collect Usage Information about how you use our Services. For example, the cookies will collect information about the pages you view or click on while using our Services or if you get an error message from certain pages. We use the information collected by such cookies to improve and optimise our Services. You can disable these cookies.

You can enable, disable, or delete cookies through the browser you are using to access our Services. To do this, follow the instructions provided by your browser (usually located within the “Help”, “Tools” or “Edit” settings). Please note, if you set your browser to disable cookies, you may not be able to access secure areas of our Services, and/or parts of the Services may not work properly for you. You can find more information about how to change your browser cookie settings at <https://www.allaboutcookies.org>.

## Section 8 - Children’s Privacy

By using this site, you represent that you are at least the age of majority in your jurisdiction of residence. Please contact us if you believe we have collected Personal Information about a child without consent from their parent or guardian, so we can take action to prevent such access and to delete their Personal Information from our Services.

## Section 9 - Retention

We generally retain your Personal Information as long as necessary to fulfil the purposes of collection or to comply with applicable law. Otherwise we will try to delete your Personal Information upon your request or when we no longer need it for the purposes it was originally collected. We will not delete any Personal Information that also relates to other individuals, unless such other individuals also wish to delete their Personal Information at the same time.

## Section 10 - Notice to Individuals in the European Economic Area and Switzerland

This section only applies to individuals using or accessing our Service while located in the European Economic Area, the United Kingdom, or Switzerland (collectively, the “European Countries”) at the time of data collection.



We may ask you to identify which country you are located in when you use or access some of the Services, or we may rely on your IP address to identify which country you are located in. When we rely on your IP address, we cannot apply the terms of this section to any individual that masks or otherwise hides their location information from us so as not to appear located in European Countries. If any terms in this section conflict with other terms contained in this Policy, the terms in this section shall apply to individuals in a European Country.

**Our Relationship to You:** Acrow is a data controller with regard to any Personal Information collected from individuals accessing or using its Services. A “data controller” is an entity that determines the purposes for which and the manner in which any Personal Information is processed.

**Legal Bases for Processing Your Personal Information:** We rely on the following Legal Bases under the EU General Data Protection Regulation in processing your Personal Information.

- The legal basis to process Personal Information for the following sections of this Website Privacy Policy is to provide our Services to you. Our processing is based on our contract obligations or to take steps at the request of the individual prior to entering into a contract.
  - Section 2: To Provide Our Services, To Provide You with Service-Related Communications, To Enforce our Terms, Agreements, or Policies.
  - Section 3: Third-Party Service Providers, Acrow Subsidiaries and Affiliates, Merger, Bankruptcy, or Corporate Reorganisation, Legal Obligations and Safety.
- The legal basis for the “**Product Research and Development**” section of this Website Privacy Policy is our legitimate interest to better understand you, to maintain and improve the accuracy of the information we store about you, and to better promote or optimise our Services.
- The legal basis for the “Comply With Applicable Laws” section of this Website Privacy Policy is to comply with our legal obligations, the public interest, or in your vital interests.
- The legal basis for the “Opt-In/Opt-Out Programmes” section of this Website Privacy Policy is your consent.

**Marketing:** We will only contact you if you are located in a European Country by electronic means (including email or SMS) based on our legitimate interests, as permitted by applicable law or your consent. If you do not want us to use your Personal Information in this way, please click the unsubscribe link at the bottom of any of our email messages to you or contact us at [acrowuk@acrow.com](mailto:acrowuk@acrow.com). You can object to direct marketing at any time and free of charge.

**Individual Rights:** We provide you with the rights described below when you use our Services. We may limit your individual rights requests: (a) where denial of access is required or authorised by law; (b) when granting access would have a negative impact on other’s privacy; (c) to protect our rights and properties; or (d) where the request is frivolous or unrealistic. If you would like to exercise your rights under applicable law, please contact us at [acrowuk@acrow.com](mailto:acrowuk@acrow.com). You can request access or deletion of your Personal Information.

- You can correct or update your Personal Information, object to processing of your Personal Information, ask us to restrict processing of your Personal Information or request portability of your Personal Information.
- If we collected and processed your Personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of the processing we conducted prior to your withdrawal, nor will it affect processing of your Personal Information conducted in reliance on lawful processing grounds other than consent.
- You have the right to complain to your local data protection authority about our collection and use of your Personal Information.



If you believe we have infringed or violated your privacy rights, please contact us at [acrowuk@acrow.com](mailto:acrowuk@acrow.com) so that we may resolve your dispute directly.

**Transfer of Your Personal Information:** When you access or use our Services, your Personal Information may be processed in the United States or any other country in which Acrow, its affiliates, or service providers maintain facilities. Such countries or jurisdictions may have data protection laws that are less protective than the laws of the jurisdiction in which you reside. If you do not want your information transferred to, processed, or maintained outside of the country or jurisdiction where you are located, you should immediately stop accessing or using the Services.

We transfer your Personal Information subject to appropriate safeguards as permitted under the Data Protection Laws. The transfer of your Personal Information out of the EEA and Switzerland is necessary for the performance of our contract with you, or the performance of a contract between us and another party that we entered into for your interest, or for important reasons of public interest. We also rely on legal transfer mechanisms such as Standard Contractual Clauses or we work with U.S. based third parties that are certified under the Swiss-U.S. Privacy Shield Framework. You have the right to request a copy of these clauses.

We may transfer your name, address, contact details, gender, employment and career history, and marketing preferences to Acrow Corporation of America, 181 New Road, Parsippany, New Jersey, USA. They can be contacted on + 1 973 244 0080, or [sales@acrow.com](mailto:sales@acrow.com).

#### **Section 11 - Notice to Individuals in California**

California law permits California residents to ask us for a notice that identifies the categories of Personal Information that we share with our affiliates and/or third parties for marketing purposes, and that provides contact information for such affiliates and/or third parties. If you are a California resident and would like a copy of this notice, please submit a written request to us at the address provided under the "Contact Information" section.

#### **Section 12 - Do Not Track Signals**

Currently, we do not monitor or take any action with respect to Do Not Track signals or other mechanisms, which means that we collect information about your online activity both while you are using the Services and after you leave our Services.

#### **Section 13 - Changes to this Website Privacy Policy**

We reserve the right to modify this Website Privacy Policy at any time, so please review it frequently. Changes and clarifications will take effect immediately upon their posting on the website. If we make material changes to this policy, we will notify you here that it has been updated, so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we use and/or disclose it.

If our store is acquired or merged with another company, your information may be transferred to the new owners so that we may continue to sell products to you.

#### **Questions & Contact Information**

If you would like to: access, correct, amend or delete any personal information we have about you, register a complaint, or simply want more information contact our Data Protection Officer at [acrowuk@acrow.com](mailto:acrowuk@acrow.com).