

# AVANTECH PRIVACY & COOKIE NOTICE

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## 1. ABOUT US

### 1.1 Introduction

This privacy & cookie notice ('the **Privacy Notice**') sets out the ways in which Avantech Limited (registered in Malta, Europe with Registration Number C9357) (hereafter '**Avantech**') may use your personal data. Should you need to contact us for any reason in relation to your privacy, our Data Protection Officer can be contacted here: [info@avantech.com.mt](mailto:info@avantech.com.mt).

### 1.2 Our Contact Details

You can contact us:

- (a) by post, using the postal address below;
- (b) using the [Website contact form](#); or
- (c) by email, on [info@avantech.com.mt](mailto:info@avantech.com.mt).

### 1.3 Data Protection Officer

Our data protection officer's contact details are:

Data Protection Officer  
Avantech Building  
St. Julian's Road  
San Gwann  
SGN2805  
Malta  
Europe

## 2. ABOUT YOUR DATA

### 2.1 Data We Process

The personal data we would like to collect/process in Your regard is the following:

TYPE OF DATA	SOURCE	WHAT IT'S USED FOR	OUR LEGAL BASIS	RETENTION PERIOD
<b>Tracking Data:</b> Data about Your use of the Website (Your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views, website navigation paths, and information	This data is obtained from Our analytics tracking system whilst You are using the Website.	To analyse the use of the Website and to personalise and optimize the content that You see on the basis of Your profile.  To offer, market and selling pro other relevant products and/or	Your consent (Note that we will not track Your activity on the Website until you have given us your permission by clicking <a href="#">here</a> ). The same link can be used to withdraw permission at	We will keep this data until You ask Us to delete it. An anonymized version of the data may be kept indefinitely.

<p>about the timing, frequency and pattern of Your use). The full list of scripts which collect this data can be found <a href="#">here</a>. Some of this information may be transferred to 3<sup>rd</sup> parties. For more information, please click <a href="#">here</a>.</p>		<p>services to You (Note that if You don't opt in, the number of adverts You will see on the Website will remain the same, but they may be less relevant to You if we haven't built a profile for You).</p>	<p>any time. We may, however, keep Enquiry Data in an anonymized form for the purpose of improving our products, service and the information on the Website.</p>	
<p><b>Registration Data:</b> Data provided to us and in some cases to 3<sup>rd</sup> Parties when you register an account with us, or register to attend one of our events (whether as a delegate, exhibitor speaker or attendee). This information might include your name, address, email address, phone number, credit card and other information relevant to the particular event or service that you're registering for.</p>	<p>This data comes directly from You if You complete a registration form or provide us with your details over the phone.</p>	<p>To provide You with an account which will enable You to make purchases on Our Website or to allow You to attend an event that We have organized.</p>	<p>We/certain 3<sup>rd</sup> Parties collect and store this data on the basis that we need to perform a contract requested by You. In addition, We have a legitimate interest to hold records for business purposes. To an extent, we also rely on Your consent to process Registration Data, in the sense that You are able to close Your account at any time.</p>	<p>We will keep this data until You delete Your account; but We will hold any data that may be required by law or to manage legal claims. An anonymized version of the data may be kept indefinitely.</p>
<p><b>Transaction Data:</b> All Data relating to Your purchasing activity and patterns.</p>	<p>This data comes directly from You when You make a purchase through Our Website.</p>	<p>To enable You to make purchases through Our Website.</p>	<p>We/certain 3<sup>rd</sup> Parties collect and store this data on the basis that we need to perform a contract requested by You. In addition, We have a legitimate interest to hold records for business purposes.</p>	<p>We will keep this data until You delete Your account; but We will also hold any data that may be required by law or to manage legal claims. An anonymized version of the data may be kept indefinitely.</p>

<p><b>Subscription Data:</b> Information that You provide to us for the purpose of subscribing to our email notifications and/or newsletters.</p>	<p>This data directly from You when You subscribe.</p>	<p>We/ certain <a href="#">3<sup>rd</sup> Parties</a> use this data to be able to send You the relevant notifications and/or newsletters as requested by You.</p> <p>We may also use this data to offer, market and sell other relevant products and/or services to You, if You would like Us to do so.</p>	<p>Your consent (Note that we will not send You any notifications and/or newsletters unless You have subscribed <a href="#">here</a>). You may also unsubscribe at any time by clicking <a href="#">here</a>.</p>	<p>We will keep this data until You unsubscribe. We may keep data to evidence that we have honored Your request to unsubscribed indefinitely.</p>
<p><b>Enquiry Data:</b> Information contained in any enquiry You submit to us regarding our products and/or services, including the communication content and metadata associated with the communication and information that is shared on the 'chat' function provided Our Website.</p>	<p>This data directly from You when You make an enquiry to Us.</p>	<p>We/certain <a href="#">3<sup>rd</sup> Parties</a> use this data to respond to a query You have made to Us and for the purpose of improving our products, service and the information on the Website.</p>	<p>Once You have made an enquiry, We have a duty to respond and thus it is Our legitimate interest to keep this data in order to provide You with an adequate reply and to respond at a later date.</p>	<p>We will keep this data until You ask Us to delete it; but We will hold any data that may be required by law or to manage legal claims. An anonymized version of the data may be kept indefinitely.</p>

## 2.2 Cookies, Scripts And Applets

A cookie is a file containing an identifier (a string of letters and numbers) that is sent by Our web server to Your web browser and is stored by Your browser for future use. The identifier is then sent back to the server each time the browser requests a page from the server. Cookies usually do not hold any information that could personally identify You, but personal information that we store about You may be linked to the information stored in and obtained from cookies. We will NOT place any cookies on Your device unless You give us permission to do so through [this link](#) You may also change Your preferences at any time through the same [link](#).

A script is a set of code loaded within Our website's HTML code as served to Your browser which specifies how Our Website behaves in response to certain behavioral patterns or click requests sent by You while using Our Website. Your browser temporarily downloads and processes scripts in order for the intended functionality to be made available. Scripts that need to request additional information in response to user-generated events (like clicks, mouse-overs, etc.) may generate additional requests to Our server. This does away with the need for users of Our Website to have

to go through a number of complicated steps to achieve an outcome while browsing a website or working on their machines. Scripts are similar in nature and in function to cookies but do not leave text files behind on Your web browser folder like cookies do. You may also change Your preferences at any time through this [link](#).

An applet is a small application that runs within the environment of another application. Our applets are cross-platform in that they can run on Windows, Mac, and Linux systems seamlessly. They are intended to run interactive features that are not possible with basic HTML.

**Please note that blocking all cookies, scripts and applets, or even some of them, will have a negative impact on the usability and possibly the rendering of many websites, including Ours. If You block cookies, scripts and applets You will not be able to use all the features on the Website and might not be able to view it correctly or in the way it was originally intended to be displayed.**

We use cookies, scripts and applets as follows:

NAME	FUNCTION	LEGAL BASIS
<b>Pure Chat</b>	We use Pure Chat to provide You with a 'chat' function for any queries You may have in relation to our products and services.	We have a legitimate interest to provide a 'chat' function on the Website for Your convenience when getting in touch with Us. This function is also based on Your consent, in the sense that it only operates when You use the 'chat' function, which is completely optional. <b>Pure Chat Privacy Policy:</b> <a href="https://www.purechat.com/privacy">https://www.purechat.com/privacy</a>
<b>Clicky</b>	We use Clicky to be able to optimize our website designs, gain insight on popular features, identify usage trends, track the delivery of our promotional content and, more generally, to know our market better in terms of geographical distribution, demography and usage patterns.	We have a legitimate interest for using this script within our Website. Without using Clicky, we would not be able to constantly update our Website to ensure that we are providing you with the best services that we can provide you with relative to the competition. All the data that is provided to us by this script is either anonymous or pseudonymous and therefore serves a function strictly in relation to research that we conduct to be able to continuously improve our services. <b>Clicky Privacy Policy:</b> <a href="https://clicky.com/terms/privacy">https://clicky.com/terms/privacy</a>
<b>Google AdWords Conversion</b>	We use Google AdWords to help us to analyse the use and performance of the Website and conversions from browser	We have a legitimate interest for using this script within our Website. Without using Google AdWords, we would not be able to understand how customers interact with our adverts. <b>Google Privacy Policy:</b> <a href="https://policies.google.com/privacy?hl=en">https://policies.google.com/privacy?hl=en</a>

	searches.	
<b>Google Analytics</b>	We use Google Analytics to be able to optimize our website designs, gain insight on popular features, identify usage trends, track the delivery of our promotional content and, more generally, to know our market better in terms of geographical distribution, demography and usage patterns.	We have a legitimate interest for using this script within our Website. Without using Google Analytics, we would not be able to constantly update the website to ensure that we are providing you with the best services that we can provide you with relative to the competition. All the data that is provided to us by this script is either anonymous or pseudonymous and therefore serves a function strictly in relation to research that we conduct to be able to continuously improve our services. <b>Google Privacy Policy:</b> <a href="https://policies.google.com/privacy?hl=en">https://policies.google.com/privacy?hl=en</a>
<b>Facebook Connect</b>	Facebook Connect is used to be able to log You into Our Website with Your Facebook login credentials and Your Facebook user profile. When You choose to access Our website through Facebook Connect, You are allowing Our Website to retrieve some of the information that You have provided to Facebook.	Our legal basis for using this script within Our website is your explicit consent. By signing in using your Facebook profile, You are automatically consenting to the provision of information described in the adjacent column. <b>Facebook Privacy Policy:</b> <a href="https://www.facebook.com/about/privacy/">https://www.facebook.com/about/privacy/</a> and <a href="https://www.facebook.com/about/privacy/update">https://www.facebook.com/about/privacy/update</a>

Permission for each kind of processing is given or withdrawn [here](#). You can change such permissions for the use of cookies, scripts and applets at any time through the same link.

### 2.3 Who has Access to Your Data

TYPE OF DATA	WHO HAS ACCESS	SAFEGUARDS
<b>Tracking Data</b>	This type of data is	Where your information may be processed

	<p>transferred to the 3<sup>rd</sup> Parties detailed in Paragraph 2.2 above.</p> <p>We may also hold some of this data directly.</p>	<p>outside of the EEA (as detailed in Paragraph 2.2 above), We have taken steps to ensure all parties are complying with the General Data Protection Regulation, including, as necessary, concluding contracts based of the European Union's Standard Contractual Clauses for cross-border data transfers.</p> <p>Data held directly by Avantech is stored on servers located in the European Union and is only accessible to our employees or by 3<sup>rd</sup> parties (also within the EEA) on a strict 'need to know' basis in accordance with our internal access policies.</p>
<b>Registration Data</b>	<p>Our online store is hosted on Shopify Inc. and We have access to it. Shopify provide Us with the online e-commerce platform that allows us to sell our products and services to You. Your data is stored through Shopify's data storage, databases and the general Shopify application. In relation to data for making payments, if you choose a direct payment gateway to complete your purchase, then Shopify stores your credit card data.</p> <p>We may also hold some of this data directly, particularly data relating to registration for participation in an event organized by Avantech.</p>	<p>Shopify is located in the United States. It is compliant with the EU-US Privacy Shield – please see: <a href="https://www.shopify.com/legal/privacy">https://www.shopify.com/legal/privacy</a></p> <p>Data relating to credit cards is also collected and processed by Shopify. Such data is encrypted through the Payment Card Industry Data Security Standard (PCI-DSS). Your purchase transaction data is stored only as long as is necessary to complete your purchase transaction. After that is complete, your purchase transaction information is deleted. All direct payment gateways adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, MasterCard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of credit card information by our store and its service providers. For more insight, you may also want to read Shopify's Terms of Service here or Privacy Statement here.</p> <p>Data held directly by Avantech is stored on servers located in the European Union and is only accessible to our employees or by 3<sup>rd</sup> parties (also within the EEA) on a strict 'need to know' basis in accordance with our internal access policies.</p>
<b>Transaction Data</b>	<p>This data is held by Shopify Inc. and We have access to it. Shopify provide Us with the online e-commerce platform that allows us to sell our products and services to You. Your data is stored through Shopify's data storage, databases and the</p>	<p>Shopify is located in the United States. It is compliant with the EU-US Privacy Shield – please see: <a href="https://www.shopify.com/legal/privacy">https://www.shopify.com/legal/privacy</a></p>

	<p>general Shopify application. In relation to data for making payments, if you choose a direct payment gateway to complete your purchase, then Shopify stores your credit card data.</p> <p>We may also hold some of this data directly, particularly data relating to registration for participation in an event organized by Avantech.</p>	<p>Data held directly by Avantech is stored on servers located in the European Union and is only accessible to our employees or by 3<sup>rd</sup> parties (also within the EEA) on a strict 'need to know' basis in accordance with our internal access policies.</p>
<b>Subscription Data</b>	<p>This data is held directly by Us; however we also share your details with SendInBlue. SendInBlue provide Us with cloud-based digital marketing tools for sending of email notifications and marketing campaigns.</p>	<p>Data held directly by Avantech is stored on servers located in the European Union and is only accessible to our employees or by 3<sup>rd</sup> parties (also within the EEA) on a strict 'need to know' basis in accordance with our internal access policies.</p> <p>SendInBlue is located in the United States, France and India. It is fully compliant with the General Data Protection Regulation – please see:  <a href="https://help.sendinblue.com/hc/en-us/categories/360000229110-GDPR">https://help.sendinblue.com/hc/en-us/categories/360000229110-GDPR</a></p>
<b>Enquiry Data</b>	<p>This data is held directly by Us; however we also share your details with Pure Chat. Pure Chat provide Us with cloud-based digital marketing live chat software.</p>	<p>Data held directly by Avantech is stored on servers located in the European Union and is only accessible to our employees or by 3<sup>rd</sup> parties (also within the EEA) on a strict 'need to know' basis in accordance with our internal access policies.</p> <p>Pure Chat is working towards full compliance with the General Data Protection Regulation – please see:  <a href="https://www.purechat.com/gdpr">https://www.purechat.com/gdpr</a></p>

## 2.4 Automated Decision-Making

Other than 'profiling' activities carried out in order to display advertisements that will be relevant to You as explained in Paragraph 2.3 above, we do not engage in any automated decision-making.

## 2.5 Personal Data relating to Children

The Website should only be accessible by individuals over the age of 16. It is a parent's or legal guardian's responsibility to ensure that persons under 16 do not complete any registration forms or make any purchases on/through Our Website. If We have reason to believe that We hold Personal Data of a person under that age, We will delete it immediately.

### 3 ABOUT YOUR RIGHTS

At any point in time during Our processing of Your data, You have the following rights. All requests in this regard may be made [here](#). We will also forward Your request to the relevant 3<sup>rd</sup> Parties mentioned above as required.

- **Right of access** – You can request a copy of the information that We hold about You.
- **Right of rectification** – You can ask Us to correct data that We hold about You if it's inaccurate or incomplete.
- **Right to be forgotten** – in some situations, You may ask Us to delete certain data We hold about You and We will always comply to the extent allowed or required by any applicable law.
- **Right to restriction of processing** – in some situations, You may ask Us to restrict the processing of Your data.
- **Right of portability** – You may ask Us to transfer certain data We hold about You to another organization.
- **Right to object** – You have the right to object to certain types of processing such as direct marketing.
- **Right to object to automated processing, including profiling** – You also have the right to object to the legal effects of automated processing or profiling.
- **Right to complain about how your Personal Data is being processed by Us (or third parties), or about how Your complaint has been handled, - You can lodge a complaint directly with the Office of the Information and Data Protection Commissioner (<https://idpc.org.mt/>) and with Our [Data Protection Officer](#).**

The version of this Privacy & Cookies Policy is currently Version 1.1 and was last updated on 25<sup>th</sup> May 2018. It is valid and applies to You until a new version uploaded on the Website and is accepted by You.