
SPIRIT SOLAR LTD: PRIVACY POLICY

BACKGROUND:

Spirit Solar Ltd (trading as Spirit Energy) understands that your privacy is important to you and that you care about how your information is used and shared online. We respect and value the privacy of everyone who visits our website and will only collect and use information in ways that are useful to you and in a manner consistent with your rights and our obligations under the law.

This policy applies to our use of any and all data collected by us in relation to your use of our website. Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of our Privacy Policy is deemed to occur upon your first use of our website. If you do not accept and agree with this Privacy Policy, you must stop using our website immediately.

1. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

"Cookie"	means a small text file placed on your computer or device by our website when you visit certain parts of our website and/or when you use certain features of our website. Details of the cookies used by our website are set out in section 12, below;
"Our website"	means this website, www.spiritenergy.co.uk ;
"UK and EU Cookie Law"	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended in 2004, 2011 and 2015; and
"We/Us/Our/we/us/our"	means Spirit Solar Ltd (a limited company registered in England under 07138647, whose registered address is 44 Portman Road, Reading RG30 1EA, which is also the company's main trading address).

2. Information About Us

- 2.1 Our website, www.spiritenergy.co.uk, is owned and operated by Spirit Solar Ltd, a limited company registered in England under 07138647, whose registered address is 44 Portman Road, Reading RG30 1EA, which is also its main trading address. Our VAT number is 984 5319 81.

3. **Scope – What Does This Policy Cover?**

This Privacy Policy applies only to your use of our website. It does not extend to any websites that are linked to from our website (whether we provide those links or whether they are shared by other users).

We have no control over how your data is collected, stored or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

4. **What Data Do We Collect?**

Some data will be collected automatically by our website (for further details, please see section 1.2 on our use of cookies), other data will only be collected if you voluntarily submit it, for example, when filling in a form to receive a downloadable guide or to request a quote. Depending upon your use of our website, we may collect some or all of the following data:

- 4.1 name;
- 4.2 business/company name;
- 4.3 contact information such as email addresses and telephone numbers;
- 4.4 address;
- 4.5 IP address;
- 4.6 a list of URLs starting with a referring site, your activity on our website;
- 4.7 content of any email sent by you or form filled in by you on our website.

5. **How Do We Use Your Data?**

- 5.1 All personal data is stored securely in accordance with the principles of the Data Protection Act 1998. For more details on security see section 6, below.
- 5.2 We use your data to provide the best possible service to you. This includes:
 - 5.2.1 providing and managing your access to our website;
 - 5.2.2 personalising and tailoring your experience on our website;
 - 5.2.3 emailing you links to guides downloaded from our website by you;
 - 5.2.4 responding to communications from you;
 - 5.2.5 supplying personalised quotations to you in respect of our products and services;
 - 5.2.6 supplying you with email newsletters and / or blog updates that you have subscribed to (you may unsubscribe or opt-out at any time by clicking the link on a newsletter or blog email that we send you);
 - 5.2.7 analysing your use of our website and gathering feedback to enable us to continually improve our website and your user experience.

- 5.3 With your permission and/or where permitted by law, we may also use your data for marketing purposes which may include contacting you by email and / or telephone and / or text message and / or post with information, news and offers on our products and services. We will not, however pass your details on to others, sell your data, or send you any unsolicited marketing or spam and will take all reasonable steps to ensure that we fully protect your rights and comply with our obligations under the Data Protection Act 1998 and the Privacy and Electronic Communications (EC Directive) Regulations 2003, as amended in 2004, 2011 and 2015.

6. **How and Where Do We Store Your Data?**

- 6.1 We only keep your data for as long as we need to in order to use it as described above in section 5, and/or for as long as we have your permission to keep it.
- 6.2 Your data will only be stored within the European Economic Area ("the EEA") (The EEA consists of all EU member states, plus Norway, Iceland and Liechtenstein).
- 6.3 Data security is of great importance to us, and to protect your data we have put in place suitable physical, electronic and managerial procedures to safeguard and secure data collected through our website.
- 6.4 Notwithstanding the security measures that we take, it is important to remember that the transmission of data via the internet may not be completely secure and that you are advised to take suitable precautions when transmitting to us data via the internet.

7. **Do We Share Your Data?**

- 7.1 We may compile statistics about the use of our website including data on traffic, usage patterns, user numbers, sales and other information. All such data will be anonymised and will not include any personally identifying information. We may from time to time share such data with third parties such as prospective investors, affiliates, partners and advertisers. Data will only be shared and used within the bounds of the law.
- 7.2 In certain circumstances we may be legally required to share certain data held by us, which may include your personal information, for example, where we are involved in legal proceedings, where we are complying with the requirements of legislation, a court order, or a governmental authority. We do not require any further consent from you in order to share your data in such circumstances and will comply as required with any legally binding request that is made of us.

8. **What Happens If Our Business Changes Hands?**

- 8.1 We may, from time to time, expand or reduce our business and this may involve the sale and/or the transfer of control of all or part of our business. Data provided by users will, where it is relevant to any part of our business so transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Policy,

be permitted to use the data for the purposes for which it was originally collected by us.

9. How Can You Control Your Data?

- 9.1** When you submit information via our website, you may be given options to restrict our use of your data. In particular, we aim to give you strong controls on our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from us which you may do by unsubscribing using the links provided in our emails).
- 9.2** You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service ("the TPS"), the Corporate Telephone Preference Service ("the CTPS"), and the Mailing Preference Service ("the MPS"). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

10. Your Right to Withhold Information

- 10.1** You may access most of our website without providing any data at all. However, to use all features and functions available on our website and to access some downloads, you may be required to submit or allow for the collection of certain data.
- 10.2** You may restrict your internet browser's use of cookies. For more information, see section 12.

11. How Can You Access Your Data?

You have the legal right to ask for a copy of any of your personal data held by Us (where such data is held) on payment of a small fee which will not exceed £50. Please contact us for more details at info@spiritenergy.co.uk, or using the contact details below in section 13.

12. What Cookies Do We Use and What For?

- 12.1** Our website may place and access certain first party cookies on your computer or device. First party cookies are those placed directly by us and are used only by us. We use cookies to facilitate and improve your experience of our website and to provide and improve our services. For more details, please refer to section 5, above, and to section 12.6 below. We have carefully chosen these cookies and have taken steps to ensure that your privacy is protected and respected at all times.
- 12.2** By using our website you may also receive certain third party cookies on your computer or device. Third party cookies are those placed by websites, services, and/or parties other than us. These cookies are not integral to the functioning of our website.
- 12.3** All cookies used by and on our website are used in accordance with current UK and EU Cookie Law.
- 12.4** Before cookies are placed on your computer or device subject to section 12.5 and section

12.8, you will be shown a pop-up requesting your consent to set those cookies. By giving your consent to the placing of cookies you are enabling us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of cookies; however certain features of our site may not function fully or as intended.

12.5 Certain features of our website depend on cookies to function. UK and EU Cookie Law deems these Cookies to be “strictly necessary”. Your consent will not be sought to place these cookies. You may still block these cookies by changing your internet browser’s settings as detailed below in section 12.10, but please be aware that our website may not work as intended if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.

12.6 The following cookies may be placed on your computer or device:

Name of Cookie	Purpose
hstc	The main cookie for tracking visitors. <i>(Expires: 2 years)</i>
Htutk	This cookie is used for to keep track of a a visitor's identity. It is used when deduplicating contacts. <i>(Expires: 10 years)</i>
Hssc	Cookie for keeping track of sessions. <i>(Expires: 30 min)</i>
Hssrc	If this cookie does not exist when we manage cookies, we assume it is a new session. <i>(Expires: None. Session cookie)</i>
hs_opt_out	This cookie is used by the opt in privacy policy to remember not to ask the user to accept cookies again. <i>(Expires: 2 years)</i>
hs_do_not_track	This cookie can be set to prevent the tracking code from retrieving information. Setting this cookie is different from opting out of cookies, which still allows anonymized information to be collected. <i>(Expires: 2 years)</i>
hs_testcookie	This cookie used to test whether the visitor has support for cookies enabled. <i>(Expires: Session cookie)</i>
hsPagesViewedThisSession	This cookie used to keep track of page views in a session. <i>(Expires: Session cookie)</i>

12.7 Our website uses analytics services, being a set of tools used to collect and analyse usage

statistics, enabling us to better understand how people use our website. This, in turn, enables us to improve our website and the services offered through it. You do not have to allow us to use these cookies, as detailed below, however whilst our use of them does not pose any risk to your privacy or your safe use of our website, it does enable us to continually improve our website, making it a better and more useful experience for you.

- 12.8** The analytics service used by our website uses cookies to gather the required information. You may remove these cookies and prevent future use of them by following the steps set out below in section 12.10.
- 12.9** You can choose to enable or disable cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all cookies or only third party cookies. By default, most internet browsers accept cookies but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.
- 12.10** You can choose to delete cookies at any time however you may lose any information that enables you to access our site more quickly and efficiently including, but not limited to, login and personalisation settings.
- 12.11** It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

13. Contacting Us

If you have any questions about our website or this Privacy Policy, please contact us by email at info@spiritenergy.co.uk, by telephone on 0118 951 4490 or by post at 44 Portman Road, Reading RG30 1EA. Please ensure that your query is clear, particularly if it is a request for information about the data we hold about you (as under section 11, above).

14. Changes to Our Privacy Policy

We may change this Privacy Policy as we may deem necessary from time to time, or as may be required by law. Any changes will be immediately posted on our website and you will be deemed to have accepted the terms of the Privacy Policy on your first use of our website following the alterations. We recommend that you check this page regularly to keep up-to-date.