

Title	Website Privacy Policy	SOP No.	ACI-POL-006
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This Privacy Policy for ACI Group Ltd (“Company,” “it,” or “its”) and its group companies explains how and why the Company may collect, store, use, and/or share (“process”) a user’s information when the user uses its services (“Services”).

**Questions or concerns?**

Reading this privacy policy helps individuals understand their privacy rights and choices. If a user does not agree with the Company’s policies and practices, they should not use its services. For further questions or concerns, users may contact the Company at [gdpr@acigroup.biz](mailto:gdpr@acigroup.biz).

**SUMMARY OF KEY POINTS**

This summary provides key points of the privacy policy. More detailed information is available in the relevant sections listed in the table of contents.

**What personal information is processed?** When a person visits, uses, or navigates ACI Group’s services, the Company may process personal information depending on interactions had with ACI Group Ltd or its group companies, the choices made, and the products and features used.

**Any sensitive personal information?** The Company does not process sensitive personal information.

**Any information from third parties?** The Company may receive information from public databases, marketing partners, social media platforms, and other outside sources.

**How information is processed?** The Company processes information to provide, improve, and administer its services, communicate with users, maintain security and prevent fraud, and comply with legal obligations. Information may also be processed for other purposes with the user’s consent, and only when a valid legal basis exists.

**In what situations and with which parties is personal information shared?** Information may be shared in specific situations with designated third parties.

**User rights?** Depending on geographic location, applicable privacy laws may grant certain rights regarding personal information.

**Excersing rights?** Users may exercise their rights by submitting a data subject access request or contacting the Company, which will act in accordance with applicable data protection laws.

Title	Website Privacy Policy	SOP No.	ACI-POL-006
-------	------------------------	---------	-------------

**TABLE OF CONTENTS**

- 1. WHAT INFORMATION DOES THE COMPANY COLLECT?
- 2. HOW DOES THE COMPANY PROCESS INFORMATION?
- 3. WHEN AND WITH WHOM DOES THE COMPANY SHARE PERSONAL INFORMATION?
- 4. DOES THE COMPANY USE COOKIES AND OTHER TRACKING TECHNOLOGIES?
- 5. IS INFORMATION TRANSFERRED INTERNATIONALLY?
- 6. HOW LONG IS INFORMATION RETAINED?
- 7. DOES THE COMPANY COLLECT INFORMATION FROM MINORS?
- 8. WHAT ARE USER PRIVACY RIGHTS?
- 9. CONTROLS FOR DO-NOT-TRACK FEATURES
- 10. DO CALIFORNIA RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?
- 11. UPDATES TO THIS POLICY
- 12. CONTACTING THE COMPANY ABOUT THIS POLICY
- 13. REVIEWING, UPDATING OR DELETING PERSONAL DATA

**1. WHAT INFORMATION DOES THE COMPANY COLLECT?**

**Personal Information Disclosed to the Company**

The Company collects personal information voluntarily provided by users when registering for services, requesting information about the Company or its products, participating in activities on the services, or contacting the Company. Information may also be obtained from public databases, marketing partners, social media platforms, and other outside sources.

**Sensitive Information**

The Company does not process sensitive information. Users must ensure that all personal information provided is true, complete, and accurate, and notify the Company of any changes.

**Information Automatically Collected**

Certain information, such as IP address and browser or device characteristics, is collected automatically when users visit the services. This information does not reveal personal identity but may include device and usage details, operating system, language preferences, referring URLs, location, and other technical information. It is primarily used for security, operation of Services, analytics, and reporting. Cookies and similar technologies may also be used.

**2. HOW DOES THE COMPANY PROCESS INFORMATION?**

The Company processes information to provide, improve, and administer its services, communicate with users, maintain security and prevent fraud, and comply with legal obligations. Processing occurs only when a valid legal basis exists and may also include other purposes with the user’s consent.

**3. WHEN AND WITH WHOM DOES THE COMPANY SHARE PERSONAL INFORMATION?**

Title	Website Privacy Policy	SOP No.	ACI-POL-006
-------	------------------------	---------	-------------

The Company may share information in specific situations, including:

- **Business Transfers:** During negotiations or completion of a merger, sale of company assets, financing, or acquisition.
- **Affiliates:** With parent companies, subsidiaries, joint venture partners, or other companies under common control, which are required to honour this privacy notice.
- **Business Partners:** To enable certain products or services.

#### 4. DOES THE COMPANY USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

The Company may use cookies and similar tracking technologies, including web beacons and pixels, to access or store information. Details on usage and opting out are provided in the Company's Cookie Policy.

#### 5. IS INFORMATION TRANSFERRED INTERNATIONALLY?

Servers are located in the United Kingdom. Users accessing services from other countries should be aware that information may be transferred, stored, and processed in the UK or by third parties in other countries. The Company takes necessary measures to protect personal information in accordance with this privacy notice and applicable law.

#### 6. HOW LONG IS INFORMATION RETAINED?

Information is retained only as long as necessary for the purposes outlined in this privacy policy, unless longer retention is required by law. When no longer needed, personal information is deleted or anonymized. Backup archives may securely store information until deletion is possible.

#### 7. DOES THE COMPANY COLLECT INFORMATION FROM MINORS?

The Company does not knowingly collect data from or market to children under 18. Users represent to be at least 18 or have parental/guardian consent. Accounts of minors discovered in the system will be deactivated and data deleted. Any suspected collection of children's data should be reported to [gdpr@acigroup.biz](mailto:gdpr@acigroup.biz)

#### 8. WHAT ARE USER PRIVACY RIGHTS?

Users may review, change, or terminate their account at any time. Users in the EEA, UK, or Switzerland may also contact relevant data protection authorities if they believe the Company is processing information unlawfully.

**Withdrawing Consent:** Users may withdraw consent at any time without affecting the lawfulness of prior processing. However, please note that this will not affect the lawfulness of the processing before its withdrawal nor, when applicable law allows, will it affect the processing of personal information conducted in reliance on lawful processing grounds other than consent.

Title	Website Privacy Policy	SOP No.	ACI-POL-006
-------	------------------------	---------	-------------

**Account Information:** Requests to terminate accounts will deactivate or delete account data from active databases. Certain information may be retained for legal, fraud prevention, or troubleshooting purposes.

## 9. CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and applications include a Do-Not-Track ("DNT") feature or setting that can activate to signal the users privacy preference not to have data about personal online browsing activities monitored and collected.

Do-Not-Track (DNT) settings are not currently recognized by the Company due to lack of a uniform standard. If a standard is adopted, the Company will update this policy.

## 10. DO CALIFORNIA RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?

California Civil Code Section 1798.83, also known as the "Shine The Light" law, permits users who are California residents to request and obtain from the Company, once a year and free of charge, information about categories of personal information (if any) disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which shared personal information in the immediately preceding calendar year.

California residents may request information about personal data shared with third parties for direct marketing and request removal of publicly posted data. Requests must include the email address associated with the account and confirmation of California residency.

## 11. UPDATES TO THIS POLICY

The Company may update this privacy policy to comply with laws and regulations. Updates will be indicated by a revised date and become effective as soon as it is accessible. Material changes may be notified directly or via posting. Users are encouraged to review the policy regularly to be informed of how the Company protects user information.

## 12. CONTACTING THE COMPANY ABOUT THIS POLICY

Questions or comments may be sent to [gdpr@acigroup.biz](mailto:gdpr@acigroup.biz) or by post to: **ACI Group Ltd**, Moor Hall, Cookham, Berkshire, SL6 9QH, United Kingdom with telephone: +44 (0)1628 601601.

## 13. REVIEWING, UPDATING OR DELETING PERSONAL DATA

Users may request access to, correction of, or deletion of their personal information by submitting a data access request via [gdpr@acigroup.biz](mailto:gdpr@acigroup.biz), in accordance with applicable laws.