



Privacy Policy

Review

Rev	Summary of Changes	Author	Date	Exec approval
V1	Final version	Jordan Cox	April 2018	

1. INTRODUCTION

The protection of your privacy is a very serious concern to the Bell-Fruit Group Ltd therefore we want you to be able to visit our web pages without being concerned about security issues. It is generally possible to use our website without the disclosure of personal data. The following Privacy Statement will provide you with an overview of how the Bell-Fruit Group Ltd guarantees the protection of your privacy, the type of data being collected as well as its main purpose.

2. IP ADDRESS

The IP address is transmitted on every server request to let the server know where the response has to be sent. Your Internet Service Provider (ISP) gives you an IP address as soon as you connect to the Internet, and the ISP can retrace which IP address was assigned to which of its customers at any given time. For as long as the IP address is saved, it is theoretically possible to identify the owner of the Internet connection via the ISP. For this reason, we and our statistics providers do not save the IP address permanently but only temporarily for session recognition and for security reasons (for example to ward off hacker attacks). The IP address is then immediately deleted, so that any collected data are made anonymous and it is no longer possible to identify the user, not even via the ISP.

3. COOKIES

3.1. The Purpose of Cookies

To allow you to use the Bell-Fruit Group Ltd's website without any restrictions, we use what are referred to as session cookies. Session cookies are tiny parcels of information that are automatically saved to the memory of the website visitor's computer. In a session cookie a randomly created and unique identification number is deposited, a so-called session ID. A cookie additionally contains information on its origin and its life span. These cookies are unable to save any other kind of data. Placing session cookies on your computer does not enable us to see the files on your computer.

After you conclude your session, i.e. after you close your browser window, the session cookies are automatically deleted.

You need to activate session cookies to be able to use website services which require authentication.

3.2. Tracking Cookies

Whenever you visit our website, some of the data we collect is used for statistical evaluation. The extent of such data is described below. The data are only used internally and serve primarily to continuously improve our website and adapt it to suit your business or personal requirements.

During a visit to our website we collect and evaluate the following data which your browser sends to our server. The data are collected using JavaScript which is run from each web page. JavaScript places a tracking cookie on your computer to identify your browser session and to recognize repeated access to the website.

The following data is collected:

- Request (name of the requested data file) (e.g. www.beispiel.de/index.html) including parameters
- Browser type and version (e.g. Internet Explorer 6.0)
- Browser language (e.g. German)
- Operating system used (e.g. Windows XP)
- Internal resolution of your browser window
- Screen resolution
- JavaScript activation
- Installed plugins (Java, Flash, Real, Quicktime, ...)
- Cookies on/off
- Color bit depth
- IP address to identify country of origin. The IP address itself is only used for geographical allocation and to identify the provider, and is immediately deleted again afterwards.
- Time and date of accessing

Any personal details you have entered in one of our forms, either to request information or get in touch with us, are also saved. The Bell-Fruit Group Ltd will use your personal data exclusively in accordance with the relevant laws and regulations.

3.3. Handling Cookies

Your browser settings allow you to set how you wish cookies to be handled. By default, the browser is set to accept session cookies. You have the option of refusing the use of session cookies.

4. PRIVACY POLICY

The Bell-Fruit Group Ltd regards privacy (data protection), information security and reliability as the basis for stable and successful customer relations. We would therefore like to take this opportunity to inform you about the Privacy Policy we have in place for the entire Bell-Fruit Group Ltd.

4.1. Privacy Principles

The protection of your privacy and the security of your personal data is a matter of great importance to us. All data applications operated by Bell-Fruit Group Ltd comply with the provisions of the General Data Protection Regulation of the European Union (abbreviated as GDPR) as well as other area-specific regulations. In accordance with Article 5 GDPR, all employees are required to process your personal data in a lawful and fair manner, and in a way that is comprehensible to you and in compliance with data secrecy in accordance with Section 6 Data Protection Act (DPA).

Compliance with the data protection and data security regulations is guaranteed across the entire Group by the following binding measures:

- Privacy Concept
- Privacy Policy
- Privacy Program
- Privacy Management System

4.2. Privacy Concept

The Privacy Concept lays down the desired level of data protection security (the protection Requirements) as defined by the legal representatives of the Bell-Fruit Group Ltd. This serves as the basis for the development of the demands on Privacy Policy and on the continuous privacy improvement process within the entire Bell-Fruit Group Ltd.

4.3. Privacy Policy

On account of the assessment of privacy-related processes and the relevant data protection legislation, a written Privacy Policy was drawn up for the Bell-Fruit Group Ltd to serve as a basis for the implementation of the Privacy Program and the establishment of the Privacy Management System.

4.4. Privacy Program

As part of the Privacy Program, data protection goals are continuously being specified and the measures to be implemented are defined in the form of a work program and provided with corresponding implementation deadlines.

4.5. Privacy Management System

The Privacy Management System defines the rules, policies, measures, resources, methods, responsibilities, procedures and organization structures for implementing and monitoring the Privacy Program.

Modelled on the international standards ISO 9001:2008 and ISO/IEC 27001:2005, our Privacy Policy was designed along the lines of the PDCA (Plan, Do, Check, Act) model to achieve continuous improvement.

4.6. Processing activities

In accordance with Article 30 GDPR, Bell-Fruit Group Ltd maintains a so-called "record of processing activities" in which the data applications operated by Bell-Fruit Group Ltd as well as the relevant

processing activities are documented. This existing record should always be kept up-to-date in accordance with the data protection provisions of Article 30 GDPR.

4.7. Special categories of personal data

Bell-Fruit Group Ltd does not process any special categories of personal data within the meaning of Article 9(1) GDPR on its website.

4.8. Guaranteed Data Protection

In principle, we do not process your personal data without your consent or within the framework of the existing contractual relationship with you and for the agreed purpose. We store your personal data in accordance with the applicable prescribed statutory time periods.

4.9. Transferring and Surrendering Data

Any transfer of personal data to third parties is made only with your consent. Excepted from this are data transfers that are necessary due to a legal obligation or for fulfilment of a contract. The transfer of personal data to processors (service providers) shall, in principle, be limited to those undertakings providing sufficient guarantees to implement appropriate technical and organisational measures in such a manner that processing the personal data complies with the requirements of the GDPR and ensures the protection of the rights of the data subject.

4.10. Data Security

The technologies employed by the Bell-Fruit Group Ltd to process your personal data (hardware, software, network, infrastructure) comply with state-of-the-art security technologies. Appropriate technical and organisational measures have been set for these procedures, in order to comply with the requirements of the GDPR.

5. INFORMATION TO BE PROVIDED

We hereby inform you about the personal data processed on this website and the claims and rights to data protection, to which you are entitled.

5.1. Categories of personal data

Personal data that you enter yourself when filling in the forms for 'login' are processed. Bell-Fruit Group Ltd processes your personal data exclusively in the context of the purpose for which you voluntarily provided your data in exercising your right to informational self-determination. This consent to the processing your personal data for the stated purposes remains valid until you revoke it, at any time, within the scope of the data protection regulations.

5.2. Right of access to personal data

In accordance with the provisions of the GDPR, you have the right to information at any time about the data processed in the Bell-Fruit Group Ltd to your person, their origin as well as possible recipients of transmissions and the purpose of the data use. Information can be obtained, based on your written request, from the Data Protection Office of Bell-Fruit Group Ltd, listed under point 5.10. If all legal requirements for the processing of your request for access to personal data have been

met, we will comply with it and grant you the relevant access to your personal data within a period of 1 (one) month.

5.3. Right to erasure

In accordance with the provisions of the GDPR, you have the right at any time to the erasure of your personal data which were processed by Bell-Fruit Group Ltd, provided that your request for erasure does not conflict with any potential statutory retention periods or other legal obligations. If all preconditions for implementing your request for erasure have been met, we will comply with it and erase your data within a period of 1 (one) month.

5.4. Right to object

In accordance with the provisions of the GDPR, you have the right - insofar as the processing of your personal data is not provided for by law - to object to the violation of your overriding confidentiality interests, which are worthy of protection. If these preconditions have been met, we will delete your data within a period of 1 (one) month, taking into account any legal retention periods.

5.5. Right to restriction of processing

In accordance with the provisions of the GDPR, you have the right to restrict processing of personal data under certain conditions. If all statutory preconditions have been met, we will restrict the processing of your personal data within a period of 1 (one) month.

5.6. Categories of recipients

The data will not be passed on to recipients who use this data for their own purposes. No transfer to recipients in a third country (outside the EU) or to an international organisation is envisaged. There is no automated decision-making process.

5.7. Right to data portability

There is no right to data portability.

5.8. Revocation of consent

In accordance with the provisions of the GDPR, you have the right to revoke your consent to the processing of your personal data at any time, without stating any reasons. In this case, we will not process your data further and will erase them, taking into account any statutory retention periods, within a period of 1 (one) month.

5.9. Complaints to the UK Data Protection Authority (Information Commissioners Office - ICO)

In accordance with the provisions of the GDPR and the UK Data Protection Act, you have the right to complain to the UK Data Protection Authority if you believe that the processing of your personal data violates the GDPR or the UK Data Protection Act.

5.10. Further Information

Your trust is very important to us. If you have further questions regarding the processing of your personal data by Bell-Fruit Group Ltd, please do not hesitate to contact the Data Protection Officer of the Bell-Fruit Group Ltd in writing at this address

Bell-Fruit Group Ltd

Leen Gate

Nottingham

UK

NG7 2LX

E-mail: DPO@Bellfruitgames.co.uk