PRIVACY POLICY

Last updated: 02 July 2026

This Privacy Policy applies between you, the User of this Website, and Simoda Limited, the owner and provider of this Website.

Simoda Limited takes the privacy of your information very seriously. This Privacy Policy applies to our use of any and all Data collected by us or provided by you in relation to your use of the Website.

Please read this Privacy Policy carefully.

Definitions and Interpretation

1. In this Privacy Policy, the following definitions are used:

Data means collectively all information that you submit to Simoda Limited via the Website. This definition incorporates, where applicable, the definitions provided in the Data Protection Laws;

Data Protection Laws means any applicable law relating to the processing of personal Data, including but not limited to the GDPR, and any national implementing and supplementary laws, regulations and secondary legislation;

GDPR the UK General Data Protection Regulation;

Simoda Limited, we or us means Simoda Limited, a company incorporated in England and Wales with registered number 11917151 whose registered office is at 81 Burton Road, The Maltings, S3 8BZ;

User or you means any third party that accesses the Website and is not either (i) employed by Simoda Limited and acting in the course of their employment or (ii) engaged as a consultant or otherwise providing services to Simoda Limited and accessing the Website in connection with the provision of such services; and

Website means the website that you are currently using, https://www.simoda.co.uk/, and any sub-domains of this site unless expressly excluded by their own terms and conditions.

2. In this Privacy Policy, unless the context requires a different interpretation:

the singular includes the plural and vice versa;

references to sub-clauses, clauses, schedules or appendices are to sub-clauses, clauses, schedules or appendices of this Privacy Policy;

a reference to a person includes firms, companies, government entities, trusts and partnerships;

"including" is understood to mean "including without limitation";

reference to any statutory provision includes any modification or amendment of it;

the headings and sub-headings do not form part of this Privacy Policy.

Scope of this Privacy Policy

3. This Privacy Policy applies only to the actions of Simoda Limited and Users with respect to this Website. It does not extend to any websites that can be accessed from this Website, including but not limited to any links we may provide to social media websites.

4. For purposes of the applicable Data Protection Laws, Simoda Limited is the "data controller". This means that Simoda Limited determines the purposes for which, and the manner in which, your Data is processed.

Data Collected

5. We may collect the following Data, which may include personal Data, depending on how you use the Website and interact with us:

name, job title, company name, email address, telephone number and other contact details that you provide to us;

enquiry details, form submissions, event registration details, competition entries, marketing preferences and any other information you choose to send to us;

technical information collected automatically, such as IP address, web browser type and version, operating system, device information, date and time of visits, pages viewed, website usage data, cookie preferences and analytics data; in each case, in accordance with this Privacy Policy.

How We Collect Data

6. We collect Data in the following ways:

data is given to us by you; and

data is collected automatically.

Data That is Given to Us by You

7. Simoda Limited will collect your Data in a number of ways, for example:

when you contact us through the Website, by telephone, post, e-mail or through any other means;

when you register with us and set up an account to receive our products/services;

when you enter a competition or promotion through a social media channel;

when you elect to receive marketing communications from us;

when you use our services;

in each case, in accordance with this Privacy Policy.

Data That is Collected Automatically

8. To the extent that you access the Website, we will collect your Data automatically, for example:

we automatically collect some information about your visit to the Website. This information helps us to make improvements to Website content and navigation, and includes your IP address, the date, times and frequency with which you access the Website and the way you use and interact with its content.

Our Use of Data

9. Any or all of the above Data may be required by us from time to time in order to provide you with the best possible service and experience when using our Website. Specifically, Data may be used by us for the following reasons:

internal record keeping;

improvement of our products / services;

transmission by email of marketing materials that may be of interest to you;

in each case, in accordance with this Privacy Policy.

10. We rely on different lawful bases depending on how and why we process your Data. These may include legitimate interests, performance of a contract, consent, compliance with a legal obligation and steps taken before entering into a contract.

Examples of how we use your Data and the lawful bases we may rely on include:

Purpose	Lawful basis
Responding to enquiries submitted through the Website, email, telephone or other channels	Legitimate interests and/or steps taken before entering into a contract
Providing products, services and account support	Performance of a contract
Sending relevant marketing communications	Consent or soft opt-in consent, where applicable
Improving the Website, services, content and user experience	Legitimate interests and/or consent where required for cookies or similar technologies
Maintaining records, security, fraud prevention and business administration	Legitimate interests and/or legal obligation

11. For the delivery of direct marketing to you via e-mail, we'll need your consent, whether via an opt-in or soft-opt-in:

soft opt-in consent is a specific type of consent which applies when you have previously engaged with us, for example where you contact us to ask for more details about a particular

product or service and we are marketing similar products or services. Under "soft opt-in" consent, we will take your consent as given unless you opt out.

for other types of e-marketing, we are required to obtain your explicit consent; that is, you need to take positive and affirmative action when consenting by, for example, checking a tick box that we provide.

if you are not satisfied with our approach to marketing, you have the right to withdraw consent at any time. To find out how to withdraw your consent, see the section headed "Your Rights" below.

12. When you register with us and set up an account to receive our services, the legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

Who We Share Data With

13. We may share your Data with the following groups of people for the following reasons:

our employees, agents and/or professional advisers - to perform the services and respond to questions and enquiries with input from the appropriate person;

third party service providers, platforms and suppliers who provide services to us which require the processing of personal data, such as website hosting, website platform services, CRM systems, email marketing tools, analytics providers, IT support, professional advisers and relevant software vendors;

relevant software vendors where needed to respond fully to enquiries and gather relevant information from experts;

in each case, in accordance with this Privacy Policy.

Where we use third party providers, we take steps to ensure that appropriate contractual, technical and organisational safeguards are in place.

Keeping Data Secure

14. We will use technical and organisational measures to safeguard your Data, for example:

access to your account is controlled by a password and a user name that is unique to you.

we store your Data on secure servers.

15. We use reputable website, hosting and technology providers, including our website platform, Wix, to support the operation and security of the Website. Wix and other service providers may process personal data on our behalf where required to provide their services.

We are working towards ISO 27001 and continue to review our internal technical and organisational measures. Any security certifications held by third party providers relate to those providers and their own services, not to Simoda Limited unless expressly stated.

16. Technical and organisational measures include measures to deal with any suspected data breach. If you suspect any misuse, loss or unauthorised access to your Data, please let us know immediately by contacting us via this e-mail address: info@simoda.co.uk.

17. If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

Data Retention

18. Unless a longer retention period is required or permitted by law, we will only hold your Data on our systems for the period necessary to fulfil the purposes outlined in this Privacy Policy or until you request that the Data be deleted.

19. Even if we delete your Data, it may persist on backup or archival media for legal, tax or regulatory purposes.

As a guide, enquiry and contact form data will be retained for as long as necessary to respond to your enquiry and manage any ongoing relationship. Marketing data will be retained until you unsubscribe, withdraw consent or ask us to delete it. Customer and supplier records may be retained for the duration of the relationship and for any further period required for legal, accounting, tax or regulatory purposes. Website analytics and cookie data will be retained in line with the relevant platform settings and our cookie management preferences.

Cookies and Similar Technologies

20. Our Website may use cookies and similar technologies to operate effectively, improve performance, understand how visitors use the Website and support marketing activity. Some cookies are strictly necessary for the Website to function and cannot be switched off. Other cookies, such as analytics, functionality or marketing cookies, will only be used where consent is required and has been provided.

You can manage your cookie preferences through the cookie banner or settings provided on the Website. You can also manage or block cookies through your browser settings, although doing so may affect how the Website works.

Where we use analytics, advertising pixels, embedded content, social media tools or third party integrations, those providers may also process personal data in line with their own privacy information. We recommend reviewing the cookie settings on the Website for details of the categories of cookies and similar technologies in use.

International Transfers

21. Some of our service providers, technology platforms or third party integrations may process personal data outside the United Kingdom. Where this happens, we will take steps to ensure that appropriate safeguards are in place, such as UK adequacy regulations, approved contractual clauses or other safeguards permitted under applicable Data Protection Laws.

Your Rights

22. You have the following rights in relation to your Data:

Right to access - the right to request (i) copies of the information we hold about you at any time, or (ii) that we modify, update or delete such information. If we provide you with access to the information we hold about you, we will not charge you for this unless your request is "manifestly unfounded or excessive." Where we are legally permitted to do so, we may refuse your request. If we refuse your request, we will tell you the reasons why.

Right to correct - the right to have your Data rectified if it is inaccurate or incomplete.

Right to erase - the right to request that we delete or remove your Data from our systems.

Right to restrict our use of your Data - the right to "block" us from using your Data or limit the way in which we can use it.

Right to data portability - the right to request that we move, copy or transfer your Data.

Right to object - the right to object to our use of your Data including where we use it for our legitimate interests.

23. To make enquiries, exercise any of your rights set out above, withdraw your consent to the processing of your Data where consent is our legal basis, or raise a data protection complaint, please contact us via this e-mail address: kate.hill@simoda.co.uk.

We will usually respond to valid rights requests within one month, unless the request is complex or we are permitted by law to extend the response period.

If you raise a data protection complaint with us, we will review the matter and aim to respond in a timely and appropriate manner. You may also contact the Information Commissioner's Office if you are not satisfied with our response.

24. If you are not satisfied with the way a complaint you make in relation to your Data is handled by us, you may be able to refer your complaint to the relevant data protection authority. For the UK, this is the Information Commissioner's Office (ICO). The ICO's contact details can be found on their website at https://ico.org.uk/.

25. It is important that the Data we hold about you is accurate and current. Please keep us informed if your Data changes during the period for which we hold it.

Links to Other Websites

26. This Website may, from time to time, provide links to other websites. We have no control over such websites and are not responsible for the content of these websites. This Privacy Policy does not extend to your use of such websites.

You are advised to read the Privacy Policy or statement of other websites prior to using them.

Changes of Business Ownership and Control

27. Simoda Limited may, from time to time, expand or reduce our business and this may involve the sale and/or transfer of control of all or part of Simoda Limited. 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 supplied to us.

28. We may also disclose Data to a prospective purchaser of our business or any part of it.

29. In the above instances, we will take steps with the aim of ensuring your privacy is protected.

General

30. You may not transfer any of your rights under this Privacy Policy to any other person. We may transfer our rights under this Privacy Policy where we reasonably believe your rights will not be affected.

31. If any court or competent authority finds that any provision of this Privacy Policy, or part of any provision, is invalid, illegal or unenforceable, that provision or part-provision will, to the extent required, be deemed to be deleted, and the validity and enforceability of the other provisions of this Privacy Policy will not be affected.

32. Unless otherwise agreed, no delay, act or omission by a party in exercising any right or remedy will be deemed a waiver of that, or any other, right or remedy.

33. This Agreement will be governed by and interpreted according to the law of England and Wales. All disputes arising under the Agreement will be subject to the exclusive jurisdiction of the English and Welsh courts.

Changes to This Privacy Policy

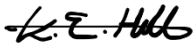
34. Simoda Limited reserves the right to change this Privacy Policy as we may deem necessary from time to time or as may be required by law. Any changes will be posted on the Website and you are deemed to have accepted the terms of the Privacy Policy on your first use of the Website following the alterations.

You may contact Simoda Limited by email at info@simoda.co.uk.

Attribution

This Privacy Policy was created on **01 January 2024** and last updated on **02 July 2026**.

This Privacy Policy is reviewed annually to ensure it remains accurate, compliant and up to date.

Signed: 

Name: Kate Hill

Title: Commercial Director

Date: 01 January 2026