

Privacy Policy

Sunbrest Ltd Digital Privacy Practices - Your Privacy is a Priority to Us.

Your privacy is important to Sunbrest Ltd and its affiliates (“Sunbrest”). This policy discloses the information practices for the Sunbrest Ltd websites: www.sunbrest.com, www.crafterman.com, www.foreign4u.com, www.edurama.pl, www.edurama.eu and www.kabaryna.pl (“Website”), including what type of information is gathered and tracked, how the information is used, and with whom the information is shared.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting the Website you are accepting and consenting to the practices described in this policy.

For the purpose of the Data Protection Act 1998 (the Act), the data controller is Sunbrest Ltd of 2nd Floor, 40 Tooting High Street, Tooting Broadway, SW17 0RG London, UK.

PERSONAL INFORMATION

In general, you can visit the Website without telling us who you are and without revealing any information about yourself. There are times, however, when we or our partners may need information from you. You may choose to give us personal information, such as your name and address or e-mail ID that may be required. It is our intent to let you know how we will use such information before we collect it from you. If you tell us that you do not want us to use this information as a basis for further contact with you, we will respect your wishes.

INFORMATION WE MAY COLLECT FROM YOU

We may collect and process the following data about you:

A. Information you give us. You may give us information about you by filling in forms on our Website or by corresponding with us by phone, e-mail or otherwise. This may include information you provide when you correspond with us, information required to process an order or to provide you with a service, information provided and when you report a problem with our Website. The information you give us may include your name, address, e-mail address and phone number, or other information that may be used to identify you personally.

B. Information we collect about you. With regard to each of your visits to our Website we may automatically collect the following information:

- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our Website (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number; and
- on occasion, Sunbrest Ltd presents a personalized URL that brings the visitor to a personalized webpage. Such a personal URL is readily identifiable and by clicking on that link and going to a personal webpage you are agreeing to let Sunbrest Ltd collect information about your session visits. We use this information to help us

provide you with information that matches your interests. If you do not wish information to be used in this way, simply do not click on such personalized URLs.

C. Information we receive from other sources. We may receive information about you if you use any of the other websites operated by Sunbrest Ltd or the other services we provide. In this case we will have informed you when we collected that data that it may be shared internally and combined with data collected on this Website. We are also working closely with third parties (including, for example, business partners, sub-contractors in technical services, analytics providers, search information providers, and may receive information about you from them.

USES MADE OF THE INFORMATION

We use information held about you in the following ways:

A. Information you give to us. We will use this information:

- to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
- to provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about;
- to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you. If you are an existing customer, we will only contact you by electronic means (e-mail or SMS) with information about goods and services similar to those which were the subject of a previous sale or negotiations of a sale to you. If you are a new customer, and where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have consented to this. If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please tick the relevant box situated on the form on which we collect your data;
- to notify you about changes to our service;
- to ensure that content from our Website is presented in the most effective manner for you and for your computer.

B. Information we collect about you. We will use this information:

- to administer our Website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our Website to ensure that content is presented in the most effective manner for you and for your computer;
- to allow you to participate in interactive features of our service, when you choose to do so;
- as part of our efforts to keep our Website safe and secure;
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- to make suggestions and recommendations to you and other users of our website about goods or services that may interest you or them.

C. Information we receive from other sources. We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

DISCLOSURE OF YOUR INFORMATION

A. We may share your personal information with Sunbrest companies and other selected third parties including:

- business partners, suppliers and sub-contractors for the performance of any contract we enter into with you; and
- analytics and search engine providers that assist us in the improvement and optimisation of our Website.

B. We may disclose your personal information to third parties:

- in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets; and/or
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our Website Terms of Use and other agreements; or to protect the rights, property, or safety of Sunbrest, our customers, or others.

WHERE WE STORE YOUR PERSONAL DATA

A. The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff maybe engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. Sunbrest Ltd will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

B. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Website and any transmission is therefore at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

INFORMATION SECURITY AND QUALITY

A. We intend to protect the quality and integrity of your personally identifiable information. We have implemented appropriate technical and organizational measures to help us keep your information secure, accurate, current, and complete. We will make a sincere effort to respond in a timely manner to your requests to correct inaccuracies in your personal information.

B. To correct inaccuracies in your personal information please return the message containing the inaccuracies to the sender with details of the correction requested.

COOKIES, WEB BEACONS AND OTHER TECHNOLOGIES

A. We sometimes collect anonymous information from visits to our Website to help us provide better customer service. This anonymous information is sometimes known as "clickstream data." Sunbrest Ltd may use this data to analyze trends and statistics and to help us provide better customer service. Also, when we collect personal data from you in connection with a transaction we may extract some information about that transaction in an anonymous format and combine it with other anonymous information such as clickstream data. This anonymous information is used and analyzed only at an aggregate level to help us understand trends and patterns. None of this information is reviewed at an individual level. If you do not want your transaction details used in this manner, you can disable your cookies. We collect the anonymous information we mentioned in the previous paragraphs through the use of various technologies, including one called "cookies". A cookie is an element of data that a website can send to your browser, which may then be stored on your system.

B. Some Sunbrest pages use cookies or other technologies to better serve you when you return to the Website. You can set your browser to notify you before you receive a cookie, giving you the chance to decide whether to accept it. You can also set your browser to turn off cookies. If you do so, however, some areas of some sites may not function properly.

C. We may also use Web beacon technologies to better tailor those sites to provide better customer service. These "Web beacons" are placed on a number of pages across the Sunbrest Ltd websites. When a visitor accesses these pages, an anonymous notice of that visit is generated which may be processed by us or by our vendors. These Web beacons work in conjunction with cookies. If you don't want to associate your anonymous cookie information with your visits to these pages, you can set your browser to turn off cookies. If you turn off cookies, web beacon technologies will still detect anonymous visits to these pages, but the notices they generate cannot be associated with other anonymous cookie information and are disregarded.

CHILDREN'S DATA

While Sunbrest Ltd's business is not directed towards children, we are committed to comply with applicable laws and requirements to ensure that children's personal data is handled appropriately.

PRIVACY TECHNOLOGY

A. Technology will increasingly help you to have more control over your personal information. It will also help organisations to manage their privacy practices and policies. As an information technology provider, Sunbrest Ltd actively supports the development of privacy technologies to help achieve these goals, and to help create greater trust and confidence in the way personal information is handled. Products and services are available which can help give you privacy protection while navigating the web.

B. See www.privacyalliance.org for an overview of many privacy-related tools. Please note that Sunbrest Ltd has not formally evaluated all of these tools.

YOUR RIGHTS

A. You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at info@sunbrest.com

B. Our Website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

ACCESS TO INFORMATION

The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a fee of £10 to meet our costs in providing you with details of the information we hold about you.

NOTIFICATION OF CHANGES

This privacy policy was last updated on 24.02.17. Sunbrest Ltd reserves the right to modify this document at any time. Please check back frequently to see any updates or changes to our privacy policy.

QUESTIONS REGARDING THIS POLICY

Questions regarding this policy should be directed to the Sunbrest Ltd website coordinator at info@sunbrest.com.

Date of issue: February 25, 2017