



PULSE4ALL - PRIVACY POLICY

Pulse4all ("**Pulse4all**", "**we**", "**our**", or "**us**") is committed to protecting and respecting your privacy.

1. OUR APPROACH TO PRIVACY

This privacy policy sets out how we collect, store, process, transfer, share and use data that identifies or is associated with you ("**personal information**") when you use any website operated by us (including, but not limited to, <https://pulse4all.co.uk/>), order any products from us, receive our services (including maintenance and repair) (together our "**Products and Services**"), or enter into business relations, or otherwise interact, with us.

2. ABOUT US

Pulse4all is the trading name for Defibswap UK Ltd, a private liability company registered in England and Wales (company no. 14733955). Our registered and postal address is Defibswap UK Ltd 94a High Street, Sevenoaks, United Kingdom, TN13 1LP.

We are the data controller of the personal information we hold about you. Defibswap UK Ltd is registered as a data controller with the UK Information Commissioner's Office ("**ICO**") under data protection registration number ZB698157.

3. PERSONAL INFORMATION WE COLLECT ABOUT YOU AND HOW WE USE IT

The table at Annex 1 sets out the categories of personal information we collect about you and how we use that information. The table also lists the legal basis which we rely on to process the personal information.

More generally, you may provide us with personal information when:

- (a) you are using our website (for example, to order the Products and Services);
- (b) we are processing and fulfilling your order in relation to the Products and Services; and
- (c) you communicate with us in relation to the Products and Services (whether online, telephone, or by email).

Special category information

We do not generally seek to collect sensitive (or "special category") personal information (such as medical or health data) through our website or as part of our Products and Services. We may, however, process special category personal information because you have voluntarily chosen to submit that information to us (for example, as part of the Products and Services).

4. DATA RETENTION

We will only retain your personal information for as long as reasonably necessary to fulfil the purposes for which it was collected. To determine the appropriate retention period for personal information, we consider the amount, nature and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, as well as the applicable legal, regulatory, tax, accounting or other requirements.

5. RECIPIENTS OF PERSONAL INFORMATION



We may share your personal information with the following (as required in accordance with the uses set out in Annex 1 or as otherwise described below):

- (a) **Service providers:** we may share your personal information with third parties and other service providers that perform services for us or on our behalf, which may include providing data hosting, data centre and storage facilities, communications, surveys and chat facilities, customer relationship management, marketing communications, advertising, technical support, error reporting and fixing, and analytics.
- (b) **Purchasers and third parties in connection with a business transaction:** your personal information may be disclosed to third parties in connection with a transaction, such as a merger, sale of assets or shares, reorganisation, financing, change of control or acquisition of all or a portion of our business.
- (c) **Law enforcement, regulators and other parties for legal reasons:** we may share your personal information with third parties as required by law or if we reasonably believe that such action is necessary to (i) comply with the law and/or the reasonable requests of law enforcement; (ii) detect and investigate illegal activities and breaches of agreements; (iii) enforce our terms and/or (iv) exercise or protect the rights, property, or personal safety of Pulse4all, its customers, personnel or others.
- (d) **Other members of the Defibswap group:** where applicable, we may share your personal information with our group affiliate(s) (for example, where they provide services on our behalf) or where such sharing is otherwise necessary in accordance with the uses set out in Annex 1.

6. MARKETING AND ADVERTISING

From time to time, we may contact you with information about the Products and Services, including sending you marketing messages and asking for your feedback on our Products and Services.

Most marketing messages we send will be by email, SMS or whatsapp. For some marketing messages, we may use personal information we collect about you to help us determine the most relevant marketing information to share with you.

We will only send you marketing messages if we have your consent or, if consent is not required under applicable law, you have not opted out of receiving messages from us. You can withdraw your consent or opt out of receiving further communications at a later date, by clicking on the unsubscribe link at the bottom of our marketing emails.

Unsubscribing from marketing emails will not unsubscribe you from system, order processing, service update, legal or similarly related notifications which we may need to send as part of the Products and Services we provide. From time to time, we may need to contact you by email or via our support team.

7. STORING AND TRANSFERRING YOUR PERSONAL INFORMATION

Security. We implement appropriate technical and organisational measures, including encryption, to protect your personal information against accidental or unlawful access, destruction, loss, alteration or damage. All personal information we collect will be stored on our secure servers. Where data processing is carried out on our behalf by a third party, we take steps to ensure that appropriate security measures are in place to prevent unauthorised disclosure of personal information.

Despite these precautions, however, we cannot guarantee the security of information transmitted over the internet or that unauthorised persons will not obtain access to personal information.



International Transfers of your Personal Information. The personal information we collect may from time to time be transferred to and stored in a country outside of the jurisdiction you are in where our affiliate(s) and our third party service providers have operations. If you are located in the UK or European Economic Area ("EEA"), your personal information may be transferred outside of the UK and EEA respectively to a country which is not recognised by the UK or European Commission as ensuring an adequate level of protection for personal data. These international transfers of your personal information will be made pursuant to appropriate safeguards, such as standard contractual clauses adopted by the European Commission and UK government (as applicable). If you wish to enquire further about the safeguards used, please contact us using the details set out at the end of this privacy policy.

8. YOUR RIGHTS IN RESPECT OF YOUR PERSONAL INFORMATION

In accordance with applicable privacy law, you have the following rights in respect of your personal information that we hold:

- (a) **Right of access.** You have the right to obtain access to your personal information.
- (b) **Right of portability.** You have the right, in certain circumstances, to receive a copy of the personal information you have provided to us in a structured, commonly used, machine-readable format that supports re-use, or to request the transfer of your personal information to another controller.
- (c) **Right to rectification.** You have the right to obtain rectification of any inaccurate or incomplete personal information we hold about you without undue delay.
- (d) **Right to erasure.** You have the right, in some circumstances, to require us to erase your personal information without undue delay if the continued processing of that personal information is not justified.
- (e) **Right to restriction.** You have the right, in some circumstances, to require us to limit the purposes for which we process your personal information if the continued processing of the personal information in this way is not justified, such as where the accuracy of the personal information is contested by you.
- (f) **Right to withdraw consent.** If you have provided consent to any processing of your personal information, you have a right to withdraw that consent (without affecting the lawfulness of our processing prior to you having withdrawn your consent).

Right to object: you also have the right, in certain circumstances, to object to any processing based on our legitimate interests in certain circumstances. You can also object to our direct marketing activities for any reason by clicking the "unsubscribe" link set out in any marketing communication you receive. See paragraph 6 for further details.

Please note that the above rights are not absolute, and we may be entitled to refuse requests, wholly or partly, where exceptions under the applicable law apply.

If you wish to exercise one of these rights, please contact us using the contact details at the end of this privacy policy.

You also have the right to lodge a complaint to your national data protection authority. If you are in the UK, information on how to contact the ICO is available at www.ico.org.uk. If you are located in the EU, further information about how to contact your local data protection authority is available at:

http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm.



We would, however, appreciate the chance to deal with your concerns before you approach any data protection authority so please contact us in the first instance (using the contact details provided at the end of this privacy policy).

9. COOKIES AND SIMILAR TECHNOLOGIES

Our website uses cookies and similar technologies to distinguish you from other customers of our Products and Services. Please refer to our Cookies Policy at [Annex 2](#) for more information as to the way in which we use cookies on our website.

10. INTEREST BASED ADVERTISING

We participate in interest-based advertising and use third party advertising companies to serve you targeted advertisements based on your online browsing history and your interests. To do this, we or our advertising partners may collect information about how you use or connect to our Products and Services, or the types of other websites, social media services, content and ads that you (or others using your device) visit or view or connect to our Products and Services so that we or our advertising partners may play or display ads on our Products and Services you may use, and on other devices you may use.

Typically, but not always, this information is collected through cookies and similar tracking technologies. We and our third party partners use this information to make the advertisements you see online more relevant to your interests, as well as to provide advertising-related services such as reporting, attribution, analytics and market research.

To learn about interest-based advertising and how you may be able to opt-out of some of this advertising and to limit some third party advertising cookies, you may wish to visit:

- Your Online Choices ("YOC"): <http://www.youronlinechoices.com/>;
- Network Advertising Initiative ("NAI"): <http://www.networkadvertising.org/>; and/or
- Digital Advertising Alliance ("DAA"): <http://www.aboutads.info/consumers>.

Please note that opting-out of receiving interest-based advertising through the NAI's and DAA's or YOC's online resources will only opt-out a user from receiving interest-based ads on that specific browser or device, but the user may still receive interest-based ads on their other devices. You must perform the opt-out on each browser or device you use.

Some of these opt-outs may not be effective unless your browser is set to accept cookies. If you delete cookies, change your browser settings, switch browsers or computers, or use another operating system, you will need to opt-out again.

Please refer to our Cookies Policy at [Annex 2](#) for more information as to the way in which we use cookies (and similar tracking technologies) on our website(s).

11. LINKS TO THIRD PARTY SITES

Our website(s) may, from time to time, contain links to and from third party websites, including those of our business partners, advertisers, news publications 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 their policies. Please check the individual policies before you submit any information to those websites.

12. CHANGES TO THIS POLICY



We may update this privacy policy from time to time and so you should review this page periodically. When we change this privacy policy in a material way, we will update the "last modified" date at the end of this privacy policy. Changes to this privacy policy are effective when they are posted on this page. Therefore, we recommend that you review this privacy policy from time to time so that you are aware of any changes.

13. CHILDREN

You must not own our Products and Services if you are under the age of 18. We do not knowingly collect personal information relating to anyone under this age. Our Products and Services may only be used if you are under the age of 18 in emergencies.

14. CONTACTING US

If you have any questions, comments and requests regarding this Privacy Policy, you can contact us:

By post:

FAO: Legal
Defibswap UK Ltd
94a High Street
Sevenoaks
United Kingdom
TN13 1LP

By email: legal@pulse4all.com.

This privacy policy was last modified on 26 July 2024.

ANNEX 1 – PERSONAL INFORMATION WE COLLECT

Category of personal information	How we use it	Legal basis for processing
<p>Contact details (full name, job title, company / business name, email address, postal / delivery address, and phone number)</p>	<p>To enter into a business relationship with you.</p> <p>To enable you to enquire about, to order, and/or to enable you to use, our Products and Services.</p> <p>To process orders and provide our Products and Services.</p> <p>To administer our contractual relationship with you (including sending you information regarding changes to our policies, other terms and other administrative information).</p>	<p>Such processing is necessary to perform our contract with you.</p> <p>Where the above is not applicable, such processing is otherwise in our and your legitimate interests to enter into, and manage, a business relationship with you and ensure the business you represent is provided with our Products and Services in accordance with our contract with that business.</p>
<p>Payment details (such as bank account details, details relating to the transaction and invoice data)</p>	<p>To take payment for our Products and Services.</p>	<p>To pursue our legitimate interests to recover debts due to us, to pay refunds or compensation owed to you, to prevent fraud and in order to fulfil our contract with you.</p>
<p>Date of birth</p>	<p>To verify your age.</p>	<p>To pursue our legitimate interests in ensuring our customer contacts are over 18.</p>
<p>Contact details</p> <p>Marketing details (such as your marketing preferences)</p>	<p>Marketing and advertising (including sending you newsletters and measuring the effectiveness of our marketing).</p>	<p>Consent (if required by law)</p> <p>Where consent is not required by law, it is in our legitimate interests to study how customers use our Products and Services and to grow and market our business.</p>

Contact details	<p>To respond to queries and complaints and provide you with information and materials that you request from us.</p> <p>To carry out surveys and/or ask for feedback with a view to improving our Products and Services.</p>	<p>It is in our legitimate interests to respond to your queries and provide any information and materials requested for you to have a positive experience with us and to maintain good customer relations.</p> <p>It is in our legitimate interests to understand how our customers feel about our Products and Services so we can take steps to improve this.</p>
Contact details ID information (including identification card, passport or driving licence)	Verification of identification and to satisfy Pulse4all's policies.	It is in our legitimate interests to carry out reasonable verification measures.
Technical information (such as IP address, browser type, internet service provider, device identifier, time zone setting, browser plug-in types and versions, preferred language, and activities). Usage data (such as clickstream to, through and from the Products and Services, pages you viewed and searched for, page response times, length of visits to certain pages, referral source/exit pages, interaction information (such as scrolling, clicks, views and mouse-overs),	<p>Analytics (such as analysing usage of the Products and Services).</p> <p>Improve the Products and Services to ensure that content is presented in the most effective manner for you.</p> <p>Marketing and advertising.</p> <p>To ascertain your preferences.</p>	<p>Consent (if require by law).</p> <p>Where consent is not required by law, it is in our legitimate interests to study how customers (and visitors) use our website(s), Products and Services and to grow and market our business.</p>

<p>date and time Products and Services are accessed, and Products and Services navigation and search terms used)</p>		
<p>Contact details</p> <p>Technical and Usage data</p>	<p>To administer and protect our business, website(s) and our Products and Services (including troubleshooting, fraud prevention, IT security, data analysis, testing, system maintenance, support, reporting and hosting of data).</p>	<p>It is in our legitimate interests to monitor the website(s), Products and Services and resolve errors to ensure that everything functions properly.</p> <p>To comply with our legal and regulatory obligations under applicable law.</p> <p>It is also in our legitimate interests to protect systems and data and to prevent and detect criminal activity that could be damaging for you and/or us.</p>
<p>All personal information referred to above</p>	<p>To enable us to comply with any legal or regulatory requirements and otherwise to meet applicable requirements of any relevant regulator or competent authority.</p>	<p>To comply with our legal obligations. Otherwise, to pursue our legitimate interest (for the purpose of establishing, exercising or defending our legal rights).</p>

ANNEX 2

PULSE4ALL - COOKIE POLICY

We use cookies and similar technologies ("**cookies**") on our website.

1. What are cookies?

"Cookies" are small text files, placed on a computer hard drive, that enable websites to remember a particular device. They are widely used to make websites work more efficiently for visitors and to provide web providers with traffic information.

Cookies allow the server to deliver personalised pages for users as cookies remember your preferences and make the interaction between you and the website smoother and more efficient. When users load the website, the browser retrieves their previous activity. This allows the browser to provide functions that make the navigation more effective.

Without cookies, we may not be able to provide certain services or features, and our website will not work as efficiently as intended. You can turn cookies off, but if you do this you may not be able to access some of the website.

2. Setting and storing cookies

Cookies may be set either by the website you are visiting ("**first party cookies**") or by third parties that run content on the website you are viewing ("**third party cookies**"). They may be stored either for the duration of your visit or for repeat visits.

3. Different types of cookies

There are four main types of cookie:

- **Strictly necessary cookies:** These cookies are essential to enable you to navigate around and use the features of a website, or to provide a service requested by you. We do not need to obtain your consent in order to use these cookies.
- **Functionality cookies:** These cookies allow a website to remember choices you make (such as language, or the region you are in) and provide enhanced, more personal features. For instance, a website may be able to provide you with local weather reports or traffic news by using a cookie to store information about the region in which you are currently located. The information these cookies collect remains anonymous and they cannot track your browsing activity on other websites.
- **Performance cookies:** These cookies collect information about how you use a website, for example which pages you go to most often, and record difficulties you may experience while using the website, for example error messages. All information collected by these cookies is aggregated and therefore anonymous. It is only used to improve the efficiency of the website.
- **Targeting cookies or advertising cookies:** These cookies are used to deliver advertisements tailored to you and your interests. They are also used to limit the number of times you see an advertisement as well as to help measure the effectiveness of the advertising campaign. They remember that you have visited a website, and this information is shared with other organisations such as advertisers. Quite often targeting or advertising cookies will be linked to site functionality provided by the other organisation.

4. Cookie table

You can find more information about the individual cookies we use and the purposes for which we use them in the table below:

Cookie Name	Cookie Type	Provider	Purpose	Duration
_fbp	Targeting / Advertising	Facebook	To deliver a series of advertisement products such as real-time bidding from third-party advertisers.	3 months
_hjSessionUser	Analytics	Hotjar	To ensure that data from subsequent visits to the same site are attributed to the same user ID.	1 year
hjSession_	Analytics	Hotjar	To ensure that the subsequent requests in the session window are attributed to the same session.	30 minutes
ac_enable_tracking	Analytics	ActiveCampaign	To track user behaviour on the website (including information such as the pages visited, time spent on each page, and interactions with the website).	1 month
fmecc_cookie_value_logged_out_user	Functionality	Fast Micro Pay	To remember the user's preferences or settings when they are logged out.	Session
prism_	Analytics/Targeting	ActiveCampaign	To collect information about how visitors use the website.	30 days
sbjs_current	Analytics	Google Analytics	To track the current session of a user, including the source from which the user came to the website (e.g., a specific campaign or referral link).	Session
sbjs_current_add	Analytics	Google Analytics	To store additional information about the current user session, supplementing the data collected by the "sbjs_current" cookie.	Session
sbjs_first	Analytics	Google Analytics	To store information about the first time a user visits the website, including the source from which the user came (e.g., a specific campaign or referral link).	6 months
sbjs_first_add	Analytics	Google Analytics	To store additional information related to the user's first visit to the website, supplementing the data collected by the "sbjs_first" cookie.	6 months
sbjs_migrations	Functionality	Google Tag Manager	To track user migrations between different versions or configurations of the analytics or tracking system.	1 year

sbjs_session	Analytics	Google Analytics	To track the user's session on the website (including recording interactions such as page views, clicks, and other actions taken during a single browsing session).	Session
sbjs_udata	Analytics	Google Analytics	<ul style="list-style-type: none"> To store user-specific data or preferences related to their interactions with the website. 	1 year

5. Other technologies we use in email marketing

We also use pixels or web beacons in direct marketing emails that we send to you. These pixels track whether our email was delivered and opened, the links within the email were clicked and which pages of our website you have visited. They also allow us to collect information such as your IP address, browser, email client type and other similar details. We use this information to measure the performance of our email campaigns, and for analytics.

You can always opt-out of our marketing communications by unsubscribing or you can email us (see our privacy policy for further details regarding marketing)

6. Consent to use cookies

We will ask for your permission (consent) to place cookies or other similar tracking technologies on your device, except where these are essential for us to provide you with a service that you have requested.

There is a notice on our home page which describes how we use cookies and requests your consent before we place any non-essential cookies on your device.

7. How to manage your cookie settings

There are various ways in which you can manage and control your cookie settings. Please note that, by deleting or blocking cookies, some or all of the websites you visit (or features of them) may not work properly or as effectively.

To find out more about cookies, including how to see which cookies have been set and how to manage and delete them, you can visit the third party website: www.allaboutcookies.org

8. Turning off cookies via your web browser

Most modern web browsers will provide you with some general information about cookies, enable you to see what cookies you have, allow you to delete them all or on an individual basis, and enable you to block or allow cookies for all websites or individually selected websites. You can also normally turn off third-party advertising cookies separately.

Please note that if you adjust your cookie settings via your web browser then, unless you delete or block each cookie individually, the changes will apply to all websites that you visit – not just our website. You will also need to adjust your cookies on a browser-by-browser basis.

9. Updates to this cookie policy

We may update this cookie policy from time to time to reflect, for example, changes to the cookies we use or for other operational, legal or regulatory reasons.

The date at the bottom of this cookie policy indicates when it was last updated.

10. Contact us

If you have any questions or comments about this cookie policy, or privacy matters generally, please contact us at legal@pulse4all.com.

This cookie policy was last modified on the 26 July 2024.