



PRIVACY POLICY

We thank you for your interest in Churchill China, we wish to ensure that we respect your individual privacy and have therefore prepared this privacy policy, which may be updated at any time without prior notice, except those required by law, and that lets you know how your personal data is used in connection with our website, www.churchill1795.com ("**Churchill China**").

This Privacy Policy has been prepared in accordance with applicable data protection and privacy legislation, including the UK General Data Protection Regulation ("**UK GDPR**"), the Data Protection Act 2018 as amended by the Data (Use and Access) Act 2025 ("**DPA 2018**"), the Privacy and Electronic Communications Regulations 2003 ("**PECR**"), the Swiss Federal Data Protection Act of 25 September 2020 ("**FDPA**"), the European Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 ("**GDPR**"), the California Privacy Rights Act ("**CPRA**"), and the Virginia Consumer Data Privacy Act ("**VCDPA**") (together, the "**Personal Data Regulation**"). This Privacy Policy describes how we collect, process and transfer personal data that we collect from users of the Churchill China website. This Privacy Policy only applies to the Churchill China website.

By choosing to visit the Churchill China website, you should read this privacy policy to know your rights and if you have any questions, you can always contact us through one of the channels indicated below.

If you are an employee of Churchill China, you should refer to the Employee Privacy policy.

If you intend to apply for a job with us or to join our talent network, you should refer to the Privacy for Applicants policy.

If you are a Churchill China customer, you should read this Privacy Policy together with our Privacy for Customers notice.

This privacy policy supplements and extends any information on data protection in conjunction with our terms of use.

In the following, we will explain some of the relevant points you should know:

1. Who we are and contact details
2. What personal data we collect
3. What we do with the personal data we collect
4. Disclosure of Personal Data for Business Purposes
5. Rights to your personal data
6. Data Transfer
7. Legal Basis
8. Security and confidentiality
9. How long we will keep your personal data
10. Supervisory Authority
11. Supervisory Authority and data protection complaints
12. Children under 18 years of age
13. Cookies
14. Marketing
15. Do you have any questions



1. WHO WE ARE AND CONTACT DETAILS

This website is owned by Churchill China, and this legal notice governs the use of such domains and subdomains.

Churchill China comprises several companies around the world, with a registered office at Marlborough Way, Sandford, Stoke on Trent, Staffordshire, UK ST6 5NZ.

You can contact us via the 'Contact' form on our homepage or our email address of info@churchill1795.com.

Your use of the web service implies your acceptance as a User of the conditions included in this notice.

Any kind of request can be sent to us in the following languages: English, French, German, Italian, Spanish.

***User:** They are all those persons of legal age who contact Churchill China, through the channels indicated, for the processing of their personal data.

2. WHAT PERSONAL DATA DO WE COLLECT?

The personal data processed by Churchill China, come directly from users who have given their prior consent to its collection and in processing in writing and/or in a reliable manner, by an existing means and that has created a link with our company.

The table below sets out what personal data we collect, the purpose of the collection and what lawful basis we rely upon when processing that personal data.

Purpose of processing your personal data	Category of personal data collected	Lawful basis
Delivering our services and record keeping in our customers or those interested in our services	Personal Identifiers (name, contact details, email address, telephone number)	Delivering our services to you, responding to communications from you in connection with our services and retaining internal records to evidence (potential) customer interactions.
Direct marketing such as administering promotions and offers that you register for plus serving online ads	Personal Identifiers (name, contact details, email address)	We will do this with your consent where required by applicable law. Where you are an existing customer, we will rely on our legitimate interest to grow our business where the law permits.
	Commercial Information: records of products or services purchased, obtained, or considered, other purchasing or consuming histories or tendencies	Understanding and improving our business and services.
Site and services improvements, network and system security	Internet and other electronic activity information: Information we obtain through your interaction with our site, including time and date of your visit, IP address, page visited and length of visit	Improving the products and services offered through the site. To conduct an internal analysis to understand how many unique visitors visit the site and to measure the areas of the site that are the most interest to visitors. And to protect the security of our systems from adverse events.



Legal and regulatory obligations we have to comply with including requests from public and government bodies	Personal Identifiers (name, contact details, IP address, email address, telephone number)	Compliance with a legal obligation – where we are required to collect and disclose your personal data because we are subject to a legal or regulatory obligation.
To protect third party's rights and property – defending legal claims, taking legal action	Personal Identifiers (name, contact details, email address, telephone number)	Our (or a third party's) legitimate interests to protect rights and property

Sensitive data recognised by current legislation will not be processed by Churchill China

3. WHAT DO WE DO WITH THE PERSONAL DATA WE COLLECT?

We use the personal data we collect about you for the following purposes:

1. To understand your needs, provide you with a better service and respond to your queries
2. For internal record keeping and maintaining data quality;
3. For internal analysis to see how many unique visitors visit the Churchill China website
4. To manage the promotions, services (e.g. webinar registrations, etc) and offers you sign up for;
5. Subject to the following, we will also use your personal data for other marketing purposes;
 - a. To improve the products and services offered through Churchill China website; and
 - b. To measure the number of visitors to the Churchill website and the areas of the website that are of most interest to visitors and to personalise the Churchill website.

We do not use the personal data you provide to us through the Churchill China website to make decisions based solely on automated processing that have a legal or similarly significant effect on you. If we introduce such automated decision-making in the future, we will provide information about the decision, the logic involved where required, and the safeguards available to you, including the right to make representations, challenge the decision and request human intervention.

To the extent permitted by applicable law, Churchill China may also use your personal data when deemed necessary or appropriate:

1. Under applicable law, including laws outside your country of residence;
2. To comply with a legal process;
3. To respond to binding and permissible requests from Authorities and Governments, including Authorities and Governments outside of your country of residence, for possible conflicts of interest;
4. To enforce our terms and conditions
5. To protect our operations or those of any of our legal entities
6. To protect our rights, privacy, safety or property, and/or those of our affiliated, you or others, and
7. To allow us to exercise remedies or limit the damages that we may suffer from any cyber attacks.

Following UK, European, and Swiss regulations, we will always seek your prior consent, as indicated above:

1. To send you marketing communications about Churchill China
2. To provide your personal data to Churchill China affiliates for marketing purposes, and
3. To provide your personal data to third parties and other partners for joint marketing efforts or their marketing efforts.

We may use your personal data for our marketing purposes, including but not limited to notifying you of new services, offers or other information by post, email, telephone, text message or other means, where we have a lawful basis to do so and where consent is obtained if required.



4. DISCLOSURES OF PERSONAL DATA FOR BUSINESS PURPOSES

The following chart describes the categories of personal data that we may disclose to third parties for a business purpose.

Categories of Consumers' Personal Data	Categories of Third Parties with which we disclose personal data for a Business Purpose
Personal Identifiers name, contact details, IP Address, email address, telephone number	Service providers that facilitate scheduling and email communications, provide security services and cloud-based storage, assist with other IT-related functions, provide site analytics; provide legal and accounting services, host or facilitate video conference services. Professional service providers including lawyers and financial advisors
Commercial Information: records of products or services purchased, obtained, or considered, other purchasing or consuming histories or tendencies	Service providers that facilitate scheduling and email communications, host or facilitate video conferencing services. Professional service providers including lawyers and financial advisors
Internet or other electronic activity information: information we obtain through your interaction with our site, including time and date of your visit, pages visited, and length of visit	Service providers that facilitate scheduling and email communication, provide security services and cloud-based data storage, assist with other IT-related functions; and provide site analytics

We may share your personal data with third-party service providers (including contractors who provide services to us) to assist with any of the uses of personal data described above. Additionally, your personal data may be provided to marketing automation platforms that we use to assist us in understanding who is visiting our website. For further information see our Cookie Notice.

We may also disclose your personal data to third parties if disclosure is required to comply with the applicable laws or regulations; comply with legal processes or a court order; to respond to requests from public and government agencies; or if disclosure is necessary to enforce our terms of use, to protect your safety or security; to protect our rights; the safety and security of our site and property or that of Churchill China Affiliates or third parties; to allow us to pursue available remedies or limit the damages we may sustain.

No Sale of Personal Data: We do not sell your personal data

We do not intend to collect sensitive personal data (which is defined under EU law to include, for example, personal data on ethnicity, racial origin and health) through Churchill China website.

5. RIGHTS TO YOUR PERSONAL DATA

The Data Subject may exercise the following rights:

- Right to request access to your personal data
- The right to request its rectification or erasure
- The right to request the restriction of the processing
- Right to object to processing
- Right to data portability



- Right to withdraw consent
- Any user may obtain information about Churchill handling of data concerning him/her.
- Right to complain to Churchill China about the way we handle your personal data and, if you are not satisfied with our response, to complain to the relevant supervisory authority.

You may exercise your rights to access to your personal data, as well as request the rectification of erroneous or incomplete data that correspond in each case, requesting deletion in cases where they are not necessary for the purposes collected.

When responding to a request for access to personal data, we will carry out a reasonable and proportionate search for the personal data requested. We may ask you to verify your identity or provide clarification where this is reasonably required to help us respond to your request.

In certain circumstances, users may request the limitation of the processing of their personal data, in which case it will only be kept for defending claims.

On the other hand, users may oppose the processing of their data, related to their particular situation, ceasing to process the data from that moment, except for compelling legitimate reasons, or the exercise of defence of possible claims.

If you have given your consent for a specific purpose, you have the right to withdraw your consent at any time, without affecting the lawfulness of the processing based on your consent before its withdrawal.

It is also the User's responsibility to keep his/her contact details updated at all times and/or notify our data protection department by email: info@churchill1795.com, indicating in the subject line '**Update Personal Data Customer Profile**', especially in the profiles created for customers of our products, to provide a quality service.

Otherwise, we may contact you by email, telephone, fax, post or other means, unless you tell us otherwise.

If you do not want us to use your personal data for marketing purposes or to provide your personal data to Churchill China affiliates or third parties for their marketing purposes, you may exercise your rights as set out above by notifying us by email to info@churchill1795.com, indicating in the email subject line: '**My Personal Data Rights**'. You may also contact us via this email for any other exercise of your rights under data protection legislation.

6. DATA TRANSFER

We may share your personal data with our subsidiaries (i.e. affiliated businesses or operating companies) in furtherance of the purposes set out in Section 3 above.

We may share your personal data with third-party service providers, including contractors who provide services to us, to assist us with any of the uses of personal data described above.

We may also disclose your personal data to third parties if the disclosure is necessary to comply with applicable laws or regulations; to comply with legal process or a court order; to respond to requests from public and government agencies; or if the disclosure is necessary to enforce our Privacy Policy and/or Terms of use; to protect your safety; to protect our rights, the safety and security of our site and property or that of Churchill China affiliates or third parties; to allow us to exercise available remedies or limit the damages that we may sustain.



We may share or transfer your personal data to a third party if Churchill China enters into, or is involved in, a business transaction such as a merger, acquisition, reorganisation or sale of some or all of its assets.

Where we transfer personal data internationally, Churchill China will ensure that appropriate safeguards are in place in accordance with applicable data protection legislation. This may include assessing whether the destination country, recipient and transfer arrangements provide protections that are not materially lower than those provided under UK data protection law, and implementing appropriate contractual, organisational or technical measures where required.

In the event of a transfer of data at any level, the User will be notified in advance at the time of giving his/her consent.

You may contact the data protection department at any time by email: info@churchill1795.com to request any additional information on this matter.

7. LEGAL BASIS

Under UK and EU law, we are required to identify the lawful basis on which we use your personal data. These are:

- Vital interest of the individual
- Public interest
- Contract management
- Compliance with legal obligations
- The legitimate interests of Churchill China or a third party, where those interests are not overridden by your rights and freedoms
- Recognised legitimate interests under UK law, where applicable and permitted for specific statutory purposes
- The legitimate interest of the data controller us to create a link between the Company and you

Following the services, we currently provide, we do not collect sensitive personal data (which under UK law includes, for example, personal data on ethnicity, race, sexuality, political affiliation, biometrics and/or health) through the Churchill website.

We reiterate that you may at any time exercise your rights set out in section 5.

8. SECURITY AND CONFIDENTIALITY

We are committed to ensuring that your personal data is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic, and managerial procedures to safeguard and secure the personal data we collect online. However, data security incidents and breaches can occur due to a variety of factors that cannot reasonably be prevented; therefore, our safeguards may not always be adequate to prevent all breaches of security. Additionally, we are not able to guarantee the confidentiality of non-confidential data such as feedback, questions, comments or ideas that you voluntarily provide to us (e.g., via the “Contact” tab or similar features on the site). We reserve the right to use and disclose such non-confidential information as we deem appropriate in compliance with applicable law.



9. HOW LONG WILL WE KEEP YOUR PERSONAL DATA?

We will retain your personal data for as long as:

- Let us maintain a commercial relationship with you;
- In the event that Churchill China is required to fulfil a legal obligation, personal data is processed for the time necessary to fulfil this obligation and as provided for by law;
- For the time strictly necessary to use the website and to access the services;
- In the context of marketing operations, three (03) years from the last contact;
- Until the withdrawal of consent, in the event that the processing is based on prior consent;
- In accordance with local country regulations.

If you have any questions about our retention policy, please contact us using the details above.

10. SUPERVISORY AUTHORITY AND DATA PROTECTION COMPLAINTS

If you have a complaint about the way we collect, use, disclose, retain or otherwise handle your personal data, you may raise a data protection complaint with us by emailing info@churchill1795.com or by writing to Churchill China (UK) Ltd, Data Protection Officer, Marlborough Way, Sandyford, Stoke-on-Trent, Staffordshire, ST6 5NZ, UK.

We will acknowledge receipt of your complaint within 30 days, take appropriate steps to investigate it without undue delay, keep you informed where appropriate, and notify you of the outcome without undue delay. We may ask you to verify your identity or provide further information where reasonably required to investigate the complaint.

If you are dissatisfied with our response, or if you believe that we have not handled your personal data in accordance with applicable data protection legislation, you may complain to the data protection supervisory authority in your home country. In the UK, the supervisory authority is the Information Commissioner's Office, which can be contacted using its website at <https://ico.org.uk>. For the European Union, details of supervisory authorities are available from the European Data Protection Board at [Our Members | European Data Protection Board \(europa.eu\)](#). If your home country is Switzerland, your supervisory authority is the Federal Data Protection and Information Commissioner.

11. LINKS TO OTHER WEBSITES

The Churchill website may contain links to enable you to visit other websites of interest to you easily. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any personal data that you provide whilst visiting such sites and such sites are not governed by this Privacy Policy. You should exercise caution and look at the privacy statement applicable to the website in question.

Our Site also uses plug-ins from these social media platforms: Facebook, LinkedIn, Twitter and YouTube. You can read more regarding how these social media platforms process your data at the following links:

- Facebook: <https://en-gb.facebook.com/privacy/explanation>
- LinkedIn: <https://www.linkedin.com/legal/privacy-policy>
- Instagram: <https://help.instagram.com/519522125107875>
- Twitter: <https://twitter.com/en/privacy>
- YouTube: <https://policies.google.com/privacy?hl=en-GB>

We have a fan page or a company page on Facebook or LinkedIn that you can use or visit. For those pages, we act as a joint controller with the social media platform for the collection of your personal data.

You can read more regarding our joint controllership with the platforms at the following links:



- Facebook: https://www.facebook.com/legal/controller_addendum
- LinkedIn: <https://legal.linkedin.com/pages-joint-controller-addendum>

12. UNDER 18 YEARS OF AGE

Churchill China does not knowingly collect personal data from persons under the age of 18 through the Churchill China website. If you are the parent or legal guardian of a person under the age of 18 and you believe that such person has provided us with personal data, please contact us at info@churchill1795.com. Where we identify that personal data has been collected from a person under the age of 18 without an appropriate lawful basis, we will take appropriate steps to delete it.

13. COOKIES

We collect certain information through our use of cookies and similar storage or access technologies. Some cookies are strictly necessary for the operation and security of the Churchill China website. We may also use analytics, statistical or functionality cookies where permitted by applicable law without consent, provided that appropriate information is given and the use is limited to the permitted purpose. Where cookies or similar technologies are used for advertising, marketing, profiling or other purposes requiring consent, we will seek your consent before using them. For detailed information on the cookies we use and the purposes for which we use them, please see our Cookie Policy.

14. MARKETING

Where required by local law, we will obtain your prior consent:

- To send you marketing communications about Churchill China; and
- To provide your personal data to affiliated companies within the Churchill China family of companies for their marketing purposes; and
- To provide your personal data to other partners for their joint marketing purposes.
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Please note that you always have the right to withdraw your consent.

If you wish to unsubscribe or opt out of our marketing, please send an email to info@churchill1795.com, indicating **UNSUBSCRIBE FROM MARKETING COMMUNICATIONS** in the subject line. Otherwise, we may contact you by email, telephone, fax, post or other means, unless you instruct us not to do so.

We may use your personal information for our own marketing purposes, including but not limited to notifying you of new services, offers or other information by mail, email, telephone, text message and other means. We will only do so with your consent where necessary.

If you have previously given your consent but no longer want us to use your personal data for marketing purposes or to provide your personal data to Churchill China affiliates or other partners for their marketing purposes, you may opt out of such uses by notifying us in accordance with the procedure set out in section 5.



15. CALIFORNIA DATA RIGHTS

Some states within our licensed markets have laws giving their residents privacy rights. This section addresses the California Privacy Rights Act of 2020 (CPRA), which provides Californians with certain rights and choices about their Personal Information.

A. Notice at Collection of Personal Information

Californians have the right to know what Personal Information is collected by Churchill China. Our Notice describes:

- The categories of Personal Information and Categories of Sensitive Personal Information Processed by Churchill China.
- Our business purpose for process the categories of Personal Information and Sensitive Personal Information.
- Whether we sell or share the categories of Personal Information we collect.
- Our retention practices.
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B. Notice of Right to Limit Use of Sensitive Personal Information

We do not use sensitive data to create inferences/To limit our use of your Sensitive Personal Information.

C. Summary of CPRA Rights

The CPRA provides Californians with the following rights and choices regarding their Personal Information.

- a. Correct
Californians have the right to request the correction of their inaccurate Personal Information and, once we receive a verifiable request, Churchill China must take reasonable steps to correct the inaccurate data.
- b. Delete
Californians have the right to request the deletion of their Personal Information and, once we receive a verifiable request, Churchill China must comply unless an exception applies. The CPRA lists several exceptions, including:
 - The data is necessary to complete a transaction for that person.
 - The data is necessary to fulfill a warranty or support a product recall.
 - The data is necessary to provide goods or services requested by that person.
 - The data is necessary to perform a contract between Churchill China and that person.
 - The data is reasonably used within the context of the ongoing business relationship between Churchill China and that person.
 - Churchill China uses the data to identify and repair issues with our Services.
 - Churchill China must retain the data to comply with a legal obligation.
- c. Do Not Sell/Share
If Churchill China sold or shared Personal Information, Californians have the right to opt out of Churchill's sale/sharing of their Personal Information.
- d. Freedom from Discrimination
Churchill China may not discriminate against Californians who exercise their rights under the CPRA.
- e. Limit
Californians have the right to limit Churchill China's use or disclosure of their Sensitive Personal Information as defined under California law.



- f. Know

Californians have the right to know what Personal Information is or has been collected by Churchill China in the 12 months before receipt of a request. If a request is made and verified, we must disclose, concerning the Personal Information collected about the requestor, the following:

- The categories of Personal Information and Sensitive Personal Information we have collected.
- Our sources of Personal Information.
- The categories of Personal Information we sold or disclosed for a business purpose.
- The categories of third parties to whom the Personal Information was sold or disclosed for a business purpose.
- Our purposes for collecting and selling/sharing Personal Information.
- Furthermore, Californians have the right to request access to specific pieces of Personal Information we have collected about them and, once we receive a verifiable request, Churchill China must provide this data following California law.

D. Exercising Your Rights and How We Will Respond

To exercise any of the rights above, or to ask a question, contact us at:

- Postal address: Churchill China (UK) Ltd (Data Protection Officer), Marlborough Way, Sandyford, Stoke on Trent ST6 5NZ, UK
- Email: info@churchill1795.com.

For requests for access or deletion, we will first acknowledge receipt of your request within 10 business days of receipt of your request. We will provide a substantive response to your request as soon as we can, generally within 45 days from when we receive your request, although we may be allowed to take longer to process your request under certain circumstances.

If we expect your request is going to take us longer than normal to fulfil, we will let you know.

We usually act on requests and provide information free of charge, but we may charge a reasonable fee to cover our administrative costs of providing the information in certain situations. In some cases, the law may allow us to refuse to act on certain requests. When this is the case, we will endeavour to provide you with an explanation as to why.

E. Our Commitment to Allowing You to Exercise Your Rights – Non-Discrimination

If you exercise any of the rights explained in this Policy, we will continue to treat you fairly. If you exercise your rights under this Notice, you will not be denied or charged different prices or rates for goods or services or provided a different level or quality of goods or services than others.

F. Verification of Identity – Access or Deletion Requests

We will ask you for identifying information and attempt to match it to information that we maintain about you.

If we are unable to verify your identity with the degree of certainty required, we will not be able to respond to your request. We will notify you to explain the basis of the denial.



G. Authorized Agents

You may designate an agent to submit requests on your behalf. The agent must be a natural person or a business entity that is registered with the California Secretary of State.

If you would like to designate an agent to act on your behalf to request or delete Personal Information, you and the agent will need to comply with our verification process: If the agent submits requests to access, know or delete your Personal Information, the agent will need to provide us with your signed permission indicating the agent has been authorized to submit the opt-out request on your behalf. We will also require that you verify your identity directly with us or confirm with us that you provided the agent with permission to submit the request.

Please note that this subsection does not apply when an agent is authorised to act on your behalf according to a valid power of attorney. Any such requests will be processed by California law about powers of attorney.

H. California Shine the Light Law

California Civil Code Section 1798.83, also known as the “Shine the Light” law, permits California residents that have an established business relationship with a business to annually request, free of charge, information about certain categories of Personal Information a business has disclosed to third parties for those parties’ direct marketing purposes in the preceding calendar year. For information and to make a request, contact us at:

- **Postal address:** Churchill China (UK) Ltd, Marlborough Way, Sandyford, Stoke on Trent ST6 5NZ UK.
- **Email:** info@churchill1795.com

16. VIRGINIA DATA RIGHTS

If you are a Virginia resident, the Virginia Consumer Data Privacy Act (“VCDPA”) grants you the following rights concerning the personal information we collect about you:

- **Right to Know:** Virginia residents have the right to confirm whether or not we are processing their personal information and to access such data, including by obtaining a copy of data that they previously provided to us.
- **Right to Delete:** Virginia residents have the right to request the deletion of the personal information that we have collected about them and to have such personal information deleted.
- **Right to Correct:** Virginia residents have the right to ask that we correct inaccuracies in their personal information, considering the nature of personal information and the purposes of processing such information.

A. Exercising your Rights

To exercise any of the rights above, or to ask a question, contact us at info@churchill1795.com. All requesters will be required to authenticate themselves before we respond to their request.

B. Verification Process

We will ask you for identifying information and attempt to match it to information that we maintain about you.

If we are unable to verify your identity with the degree of certainty required, we will not be able to respond to your request. We will notify you to explain the basis of the denial.



C. Response Timeline and Additional Information

For requests to know, delete or correct personal information, we will provide a substantive response to your request as soon as we can, generally within 45 days from when we receive your request, although we may be allowed to take longer to process your request under certain circumstances. If we expect your request is going to take us longer to fulfil, we will let you know.

We usually act on requests and provide information free of charge, but we may charge a reasonable fee to cover our administrative costs of providing the information in certain situations. In some cases, the law may allow us to refuse to act on certain requests. When this is the case, we will endeavour to provide you with an explanation as to why.

17. UPDATES TO THIS NOTICE

We may update this Notice by posting a new version on our website. If we update this Notice in a way that significantly changes how we use your personal data, we will bring these changes to your attention where reasonably possible. Otherwise, we recommend that you periodically review this Notice to be aware of any other revisions.