

Privacy Policy

Update Date: 3 April 2023

Please read this policy carefully before using our Sites or interacting with us. It contains our privacy and cookie policy. Please see our Legal Information for more information about the Business, Website and other Sites to which this Privacy Policy relates.

Introduction

We respect your privacy and are committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our Website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you. We use Sites to deliver the Services, including our Website and its subdomains (“**our Site**”), and third party platforms, websites, products and service providers, including social media (“**Sites**”).

Please also use the Glossary to understand the meaning of some of the terms used in this privacy policy.

1. Important information and who we are

Controller

The Business described in the Legal Information is the controller and responsible for your personal data (collectively referred to as “**Business**”, “**we**”, “**us**” or “**our**” in this privacy policy). We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise *your legal rights*, please contact the data privacy manager using the details set out below.

Contact Details. If you have any questions about this privacy policy or our privacy practices, please contact our data privacy manager using the Contact Details on the Legal Information.

Complaints. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Purpose of this privacy policy

This privacy policy aims to give you information on how we collect and process your personal data through your use of our Sites, including any data you may provide through this Website or our other Sites when you purchase a product or service, or communicate or interact with us. This Website is not intended for children and we do not knowingly collect data relating to children. It is important that you read this privacy policy together with any other privacy/data protection notice or clauses or fair processing policy (**other privacy policies**) we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them, except where otherwise stated in those other privacy policies.

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. We reserve the right to change it at any time without notice and we encourage you to read it periodically to ensure that you are at all times fully aware of it. Any changes are effective immediately upon posting to our Website or written notice to you.

This version was last updated on Update Date first mentioned above. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

This Website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our Website, we encourage you to read the privacy policy of every site you visit.

2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, place of birth, date of birth and gender; passport number, driver's license number, and other/similar identity document information; national insurance number; tax codes or similar information.
- **Contact Data** includes billing address, delivery address, previous addresses, email address and telephone numbers, business address, business email addresses and telephone numbers.
- **Financial Data** includes bank account and payment card details; personal and business financial records.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this Website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our Website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific Website feature.

However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform any contract we have or are trying to enter into with you (for example, to provide you with products or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email, via an account dashboard or otherwise. This includes personal data you provide when you:
 - apply for our products or services;
 - purchase and use our products and services;
 - register as a customer or user;
 - create an account on our Website or any third party Sites that we use to deliver the products and services;
 - join any subscription or membership;
 - join any of our groups on social media or in person;
 - subscribe to our service or publications, including newsletters;
 - request marketing to be sent to you;
 - enter a competition, promotion or survey;
 - engage with us and content on our Sites;
 - feature in our publications or attend our events or request us to feature in or attend yours, such as podcasts or other audio-visual or written publications and related marketing materials
 - partake in our market research;
 - give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our Website, or certain other Sites such as landing pages that are not on our Website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other Websites employing our cookies. Please see our cookie policy below for further details.
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources as set out below:

- Technical Data from the following parties:
 - a) analytics providers such as Google Analytics based outside the UK;
 - b) advertising networks such as Google, Instagram, TikTok or LinkedIn based outside the UK; and
 - c) search information providers such as Google based outside the UK.
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as GoCardless in the UK or Stripe based outside the UK.
- Identity and Contact Data from data brokers or aggregators such as Experian based inside the UK and others based outside the UK.
- Identity, Contact and Financial Data from credit checking and compliance screening service providers such as Creditsafe based in the UK or similar outside the UK.
- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the UK.

4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

Please read the *Glossary* to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via phone, email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to any of our terms and conditions, Policies or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and this Website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant Website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our Website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our Website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. You can change your preferences by logging into the Website and checking or unchecking relevant boxes, by following the opt-out links on any marketing message sent to you, or by contacting us at any time.

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased products or services from us and you have not opted out of receiving that marketing.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by logging into the Website and checking or unchecking relevant boxes to adjust your marketing preferences, by following the opt-out links on any marketing message sent to you, or by contacting us at any time using the Contact Details.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

Cookies

Our Website uses cookies to distinguish you from other users of our Website. This helps us to provide you with a good experience when you browse our Website and also allows us to improve our site.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

Our cookies

We use the following cookies:

- **Strictly necessary cookies.** These are cookies that are required for the operation of our Website. They include, for example, cookies that enable you to log into secure areas of our Website, use a shopping cart or make use of e-billing services.
- **Analytical or performance cookies.** These allow us to recognise and count the number of visitors and to see how visitors move around our Website when they are using it. This helps us to improve the way our Website works, for example, by ensuring that users are finding what they are looking for easily.
- **Functionality cookies.** These are used to recognise you when you return to our Website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **Targeting cookies.** These cookies record your visit to our Website, the pages you have visited and the links you have followed. We will use this information to make our Website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

Third party cookies

Please note that the third parties listed on the Legal Information may also use cookies, over which we have no control. These named third parties may include, for example, advertising networks and providers of external services like web traffic analysis services. These third party cookies are likely to be analytical cookies, performance cookies or targeting cookies.

Cookie controls

To change your cookie settings, deactivate or block our cookies or the use of third party advertising cookies, please see below.

You can choose which analytical, functionality and targeting cookies you accept by adjusting your settings via our cookie settings widget on your screen. You can do this by adjusting the sliders to opt in or out of the cookie categories. To save your changes, scroll to the bottom and click on the save button. If you cannot see the save button, you may be using a blocker to prevent the setting of cookies.

Browser cookie controls

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our Website.

Information about how to configure your browser to block cookies can be found at:

- [Google Chrome](#)
- [Microsoft Edge](#)
- [Internet Explorer](#)
- [Firefox](#)

- [Safari](#)
- [Safari Mobile](#)
- [Opera](#)

If you prefer to not have data reported by Google Analytics, you can install the Google Analytics Opt-Out Browser Add-On by following the instructions [here](#).

You can find out how to opt out of Google's use of tracking technologies via the Google advertising opt-out page [here](#).

Advertising

To learn more about adverts which are displayed to you whilst you are online, please consult the applicable site's privacy and cookie policy on which you see our ads.

The advertising companies we work with generally use cookies and similar technologies as part of their services. To learn more about how advertisers generally use cookies and the choices they offer, you can review the following resources:

- [Digital Advertising Alliance](#)
- [European Interactive Digital Advertising Alliance](#)

Expiry of cookies

Except for essential cookies and targeting cookies, all cookies will expire after you have finished your browsing session.

More information about cookies

You can find out more about cookies, including how to see what cookies have been set and how to manage and delete them by visiting www.aboutcookies.org or www.allaboutcookies.org.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us using our Contact Details. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of your personal data

We may share your personal data with the parties set out below for the purposes set out in the table '*Purposes for which we will use your personal data*' above.

- External Third Parties as set out in the *Glossary*.
- Specific third parties such as those listed in the Legal Information.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. International transfers

We may share your personal data with External Third Parties who are or become based outside the UK and EEA temporarily or permanently, so their processing of your personal data will involve a transfer of your personal data outside the UK and EEA. Whenever we transfer your personal data out of the UK and EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK or EEA.

7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect of our relationship with you. To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements. By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes. In some circumstances you can ask us to delete your data: see *your legal rights* below for further information. In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please see the *Glossary* to find out more about these rights:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact us.

No fee usually required. You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond. We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best products and services and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract. Please note that contracts include the agreements between you and us in relation to our Services and your interactions with our Sites.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

THIRD PARTIES

External Third Parties

- Service providers based in the United Kingdom who provide consultancy services, IT services, management services, marketing services, business administration and support services, and associated services.
- Professional advisers including lawyers, bankers, accountants, and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Service providers based outside the United Kingdom and EEA to whom we subcontract, outsource or use to provide services for the purposes set out in this policy.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.