

## S.O.P. INTERNATIONAL LIMITED

### PRIVACY NOTICE

This version is effective from: 01/042021

This Privacy Notice (“**Privacy Notice**”) sets out how SOP International Limited processes your personal data in connection with our business, including the provision of our corporate website at [www.sopinternational.com](http://www.sopinternational.com) (“**Corporate Site**”) and our online store at [www.soponlinestore.com](http://www.soponlinestore.com) (“**Online Store**”) and the products we offer, including through our Online Store and other physical locations (“**Products**”). In this Privacy Notice, we use the term “**Sites**” to refer to our Corporate Site and our Online Store collectively.

We will update this Privacy Notice from time to time to reflect any changes or proposed changes to our use of your personal data, or to comply with changes in applicable law or regulatory requirements. We may notify you by email of any significant changes to this Privacy Notice, but we encourage you to review this Privacy Notice periodically to keep up to date on how we use your personal data. If we update this Privacy Notice, we will update the effective date at the top of the page.

Your access to and use of our Sites, including your trade account page and any secure area, is subject at all times to our Terms of Use on the relevant Site. If you have a registered trade account with us and you purchase Products from us, your purchase will be subject to our [Terms and Conditions of Sale](#), which you agreed to when opening your account with us. Purchases made through our Online Store will be subject to the [Terms of Sale](#) on our Online Store.

#### 1 PURPOSE OF THIS PRIVACY NOTICE

This Privacy Notice explains our approach to any personal data that we might collect from you or which we have obtained about you from a third party, and the purposes for which we process your personal data. This Privacy Notice also sets out your rights in respect of our processing of your personal data.

When we talk about “personal data”, we mean any information that relates to an identified or identifiable living individual. Individuals might be identified by reference to a name, an identification number, location data, an online identifier (such as an IP address) or to other factors that are specific to them, such as their physical appearance.

This Privacy Notice is intended to assist you in making informed decisions when using our Sites and our Products. Please take a moment to read and understand it. It should be read in conjunction our [Website Terms of Use](#) and our [Cookie Notice](#).

This Privacy Notice only applies to the use of your personal data obtained by us, whether from you directly or from a third party. It does not apply to personal data collected by third parties during your communications with those third parties or your use of their products or services (for example, where you follow links to third party websites over which we have no control, or you purchase goods or services from those third parties).

#### 2 ABOUT US

The Sites and our Products are made available by SOP International Limited (“**SOP**”, “**we**”, “**us**”, “**our**”). SOP is the controller responsible for your personal data. SOP is a private limited company registered in England under company registration number 01865316. Our registered office is at Grafton House Icon Harlow, Third Avenue, Harlow, Essex, England CM19 5AW. We are registered with the Information Commissioner’s Office under registration number Z8778235.

### 3 HOW TO CONTACT US

If you have any questions about this Privacy Notice or want to exercise [your rights as a data subject](#) set out in this Privacy Notice you can contact our Data Protection Coordinator by using the following methods:

<b>Email</b>	Send us an email at: [ <a href="mailto:info@sopinternational.com">info@sopinternational.com</a> ]
<b>Post</b>	Write to us at: Data Protection Coordinator, SOP International LTD, ICON, Grafton House, Third Ave, Harlow CM19 5AW
<b>Telephone</b>	Call us on: (+44) 01279 969 888

If you just want to change your marketing preferences or opt out of marketing altogether, you can do so by contacting us using the above details. You can also opt out of our marketing emails at any time by clicking the unsubscribe link in our marketing emails.

### 4 THE TYPES OF PERSONAL DATA WE COLLECT

In providing our Sites and our Products, we may collect and process different types of personal data about you for different processing purposes. The types of personal data we collect depends on who you are and how you use our Sites and our Products and generally includes some or all of the following (as applicable):

<b>Identity Data</b>	First name; last name; job title; organisation you represent.
<b>Contact Data</b>	Postal address; billing address; delivery address; email address; telephone number; social media handle.
<b>Registration Data</b>	Trading name, company registration number, company registered office address, delivery address, landline, mobile telephone and fax numbers, email address, account password/memorable word, bank details (bank name, address, sort code, account number, IBAN number), contact name, date of birth, home address, portrait and other information shown on a photo ID (such as a passport or driving licence); any other personal data you provide when you register a trade account with us.
<b>Financial Data</b>	Bank account details; partial payment card details.
<b>Transaction Data</b>	Details about payments made between you and us; details of Products purchased from us.
<b>Profile Data</b>	Username; account password; purchase/order details; interests and preferences; contact preferences; whether you have participated in any promotions or competitions; feedback and survey responses; the content of any message you send to us using the online enquiry forms on our Sites.
<b>Behavioural Data</b>	Data relating to your browsing activity or interaction with our emails, obtained through the use of cookies, pixel tags and other similar technologies; information about when your current or previous sessions started; details about Products or Services you viewed or purchased through the Sites.
<b>Technical Data</b>	IP address; browser type and operating system; geolocation, to ensure we're showing you the correct notices and information; any other unique numbers assigned to a device.

<b>Marketing and Communications Data</b>	Marketing preferences; service communication preferences.
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## 5 HOW WE COLLECT AND RECEIVE PERSONAL DATA

We collect and receive personal data using different methods:

<b>Personal data you provide to us</b>	You may give us your personal data directly, for example, when you purchase Products, contact us with enquiries, complete an application for a trade account with us, complete other forms, subscribe to receive our marketing communications or provide survey responses and feedback to us.
<b>Personal data we collect using cookies and other similar technologies</b>	When you access and use our Sites, we will collect certain Behavioural Data and Technical Data. We collect this personal data by using cookies and other similar technologies (see the “ <a href="#">Insight, analysis and retargeting through Cookies</a> ” section below).
<b>Personal data received from third parties</b>	We may receive personal data about you from third parties. Such third parties may include analytics providers, credit reference agencies, data brokers, debt collection agencies, third party directories and third parties that provide technical services to us so that we can provide our Sites and our Products. For those applying for a job with us, we may also receive personal data from employment background check providers and previous employers.
<b>Publicly available personal data</b>	From time to time, we may collect personal data about you that is contained in publicly available sources (including open source data sets or media reports) or that you or a third party may otherwise make publicly available (for example through speeches at events or publishing articles or other news stories or posts on social media platforms).

## 6 WHO WE COLLECT PERSONAL DATA ABOUT

We collect and process personal data from the following people:

<b>Site visitors/users</b>	If you browse our Sites or register a customer account on our Sites, we will collect and process your personal data in connection with your interaction with us and our Sites.
<b>Visitors to our premises</b>	If you attend one of our offices or other locations, we may process personal data that you volunteer in connection with your visit and any enquiries you make. CCTV footage may also be collected for security purposes.
<b>Trade customers</b>	If you buy our Products, we may collect and process your personal data in connection with the supply of Products to you.
<b>People who contact us with enquiries</b>	If you contact us with an enquiry through our Sites, submit a complaint through our Sites or provide any feedback to us in our surveys and feedback forms, we will collect and process your personal data in connection with your interaction with us and our Sites.

<b>People who work for our customers and suppliers</b>	If you work for one of our customers or suppliers and have responsibility for placing orders with us, administering your organisation's trade account with us or handling our orders or our account with your organisation, we will process your personal data in connection with your organisation's relationship with us.
<b>Event attendees</b>	If you attend one of our events, we will process personal data about you in connection with your attendance at the event. For example, we may ask you to complete a registration or feedback form, or other document relating to the event.
<b>Job applicants</b>	If you apply for a job with us, we will collect and process the personal data you volunteer in connection with your application.

## 7 HOW WE USE YOUR PERSONAL DATA

We use your personal data for the purposes set out in this section. If we wish to make any changes to these purposes, or if we wish to use your personal data for any purpose that is not listed in this section, we will update this Privacy Notice and, if required by law, notify you using the contact details we hold for you.

### Use of our Sites

<b>If you browse our Sites</b>	<p>When you browse our Sites, we collect and process certain Behavioural Data and Technical Data to help us understand how you are using and navigating our Sites. We do this so that we can better understand which parts of our Sites are popular and improve the structure and navigation of our Sites.</p> <p><b><i>Our legal basis for processing</i></b></p> <p>It is necessary for us to use your personal data to perform our obligations in accordance with any contract that we may have with you in relation to any account you have with us, or it is in our legitimate interest or a third party's legitimate interest to use personal data in such a way to ensure that we provide access to our Sites in a secure and effective way and so that we can maintain and improve our Sites.</p>
<b>If you register and access an account on our Online Store</b>	<p>You may be required to register an account with us in order to gain access to certain features and functionality of our Online Store and/or to receive certain offers and benefits. Account applicants will need to complete the registration form, providing your Identity Data, Contact Data and a password. We will use this data to process your registration. We may collect and process your personal data whether you are interacting with us on your own behalf or on behalf of any organisation you represent.</p> <p>Once the account is registered, we will process your Identity Data, Contact Data and password to identify you when you log in to your account and access secure areas of our Online Store. We will also process certain Technical Data and Marketing and Communications Data so that we can administer your account and contact you about your account.</p>

	<p>We will also collect and process Behavioural Data and Technical Data when you use certain features and functionality on our Online Store. This data helps us understand how you use our Online Store so that we can improve it.</p> <p>Please also see the section above entitled “<a href="#">If you browse our Sites</a>” for more general information about how we process your personal data when you use our Sites.</p> <p><b><i>Our legal basis for processing</i></b></p> <p>It is necessary for us to use your personal data to perform our obligations in accordance with any contract that we may have with you in relation to your account and any Products, or it is in our legitimate interest to use personal data in such a way to ensure that we provide access to the Online Store and our Products in a secure and effective way and so that we can make improvements to our Online Store.</p>
<p><b>If you make a purchase through our Online Store</b></p>	<p>When you purchase Products through our Online Store, we collect and maintain personal data that you submit to us via the Online Store for the purpose of supplying our Products to you. We may collect and process your personal data whether you are interacting with us on your own behalf or on behalf of any organisation you represent.</p> <p>The personal data we process may include your Identity Data, Contact Data, Profile Data, Financial Data and Transaction Data (where applicable). If you make a purchase through your account on our Online Store, we will process your Identity Data, Contact Data and password when you log in to your account.</p> <p>We process this information so that we can process your order, take your payment and deliver the Products to you. We will also process your personal data for the purpose of any returns, to maintain our customer databases and to keep a record of your Product purchases.</p> <p>If you purchase Products on our Online store, our Online Store <a href="#">Terms of Sale</a> will also apply to you.</p> <p><b><i>Our legal basis for processing</i></b></p> <p>It is necessary for us to use your personal data to perform our obligations in accordance with any contract that we may have with you for the Products, or it is in our legitimate interest or a third party’s legitimate interest to use personal data in such a way to ensure that we provide our Products, and make them available for sale, in an effective, safe and efficient way.</p>
<p><b>If you request a brochure through our Sites</b></p>	<p>We use your Identity Data and Contact Data to send you our brochures and other publications when you request them.</p> <p><b><i>Our legal basis for processing</i></b></p> <p>It is in our legitimate interest or a third party’s legitimate interest to use your personal data in the ways described</p>

	<p>above to ensure that we are able to help with your request and provide a good standard of service.</p>
<p><b>If you link to social media sites through our Sites and/or interact with our social media pages</b></p>	<p>If you click on one of the social media links on our Sites or otherwise interact with our social media pages such as on Facebook, Twitter, YouTube, Instagram or LinkedIn (including interacting with any “like” or similar embedded features on our Sites or social media accounts), we and the relevant social media platform may receive information relating to such interaction and may share your personal data in connection with this purpose, such as certain Behavioural Data and Technical Data. For more information about how we use this personal data, please see the <a href="#"><u>“Insight, analysis and retargeting through Cookies”</u></a> section below.</p> <p>The relevant social media platform may also be a controller in respect of the personal data that is collected via your use of our social media pages and may use that personal data for additional purposes. For details of how the relevant social media platform uses your personal data, please see the privacy notice of the relevant social media platform.</p> <p><b><i>Our legal basis for processing</i></b></p> <p>It is in our legitimate interest or a third party’s legitimate interest to use personal data in the ways described above to ensure that we provide our Sites in an effective way and to promote our Sites via social media.</p>

**Trade account customers – this section only applies to you if you or the organisation you represent have (or apply for) a trade account with us**

<p><b>If you apply for a trade account with us</b></p>	<p>If you wish to open a trade account with us, you will be required to complete a new account application form and provide the applicable Registration Data. We may collect and process your personal data whether you are interacting with us on your own behalf or on behalf of any organisation you represent.</p> <p>The Registration Data we collect depends on the nature of your trading status but will generally include your trading name, trading address, delivery address, landline, mobile and fax numbers, email address and your bank details (bank name, address, sort code, account number and/or IBAN number).</p> <p>If you are applying for a trade account on behalf of a limited company, we will also collect your contact name, the company’s registration number and registered office address. For sole traders, partners in a partnership and any other non-company applicant, we will also collect your name, date of birth and home address.[Applicants will also need to provide a photo ID (passport or driving licence) to enable us to identify the applicant or, if applicable, a relevant company director.</p> <p>We will use your personal data for the purpose of processing your application for a trade account and, once your account</p>
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	<p>is open, we will process your personal data so that we can administer your account, make our account features and benefits available to you and communicate with you about your account, any orders you have placed and any important information that may affect you or your use of our Products.</p> <p>If you have applied for credit terms or you wish to change an existing credit limit, we will process your personal data to carry out credit checks through credit reference agencies.</p> <p>In the case of non-payment, we may process your personal data for the purpose of debt recovery action.</p> <p><b><i>Our legal basis for processing</i></b></p> <p>It is necessary for us to use your personal data to perform our obligations in accordance with any contract that we may have with you for the Products or in relation to your trade account, or it is in our legitimate interest or a third party's legitimate interest to use your personal data in the ways described above to ensure that we are able to administer your account, make our account features and benefits available to you, ensure that we provide a good standard of service and to help us improve our customer service and our Products.</p>
<p><b>If you purchase Products from us using your trade account with us</b></p>	<p>We collect and maintain personal data that you submit to us for the purpose of supplying Products that you have requested from us using your trade account with us. We may collect and process your personal data whether you are interacting with us on your own behalf or on behalf of any organisation you represent.</p> <p>You may place orders for Products in a variety of ways, including where an SOP representative attends your premises, where you attend our premises or by distance communication such as email, telephone or a mobile messaging service. The personal data we process in connection with your order will therefore depend on how and where you are interacting with us but will generally include your Identity Data and Contact Data, as well as certain Registration Data, Profile Data and Financial Data (where applicable).</p> <p>We process this information so that we can process your order, take your payment and deliver the Products to you. We will also process your personal data for the purpose of any returns, maintaining our customer databases and to keep a record of your Product purchases.</p> <p>If you purchase Products through your trade account with us, our trade account <a href="#">Terms and Conditions of Sale</a> will also apply to your purchase.</p> <p><b><i>Our legal basis for processing</i></b></p> <p>It is necessary for us to use your personal data to perform our obligations in accordance with any contract that we may have with you (or the organisation you represent) for the Products you have requested, or it is in our legitimate interest or a third</p>

	party's legitimate interest to use personal data in such a way to ensure that we provide our Products in an effective, safe and efficient way.
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### Customer service and enquiries

<b>If you have a general question or need help with any issue concerning our Sites or our Products</b>	<p>There are various ways in which you are able to contact us (see the <a href="#">“How to contact us”</a> section above). In particular, our Sites feature a “Contact Us” page, which invites you to contact us via an online enquiry form. From time to time, you may also be able to submit specific enquiries on other pages of our Sites, including in secure account areas.</p> <p>When you make an enquiry, we will collect and process your Identity Data and Contact Data (either your telephone number or your email address, depending on how you would like us to respond), as well as any other personal data you volunteer that is relevant to your enquiry. We use this information to manage and respond to your enquiry.</p> <p>We may also record your enquiry (including voice recordings of telephone conversations) and use the information referred to above to train our personnel so that they are able to deal with enquiries in an effective way.</p> <p><b><i>Our legal basis for processing</i></b></p> <p>It is in our legitimate interest or a third party's legitimate interest to use your personal data in the ways described above to ensure that we are able to help you with your enquiry, provide a good standard of service and improve our customer services and staff training.</p>
<b>If you wish to return any Products to us</b>	<p>If you wish to return any Products you have purchased from us, we will collect and process your Identity Data and Contact Data and, if applicable, certain Registration Data, Profile Data, Payment Data and Transaction Data, as well as any other personal data you volunteer that is relevant to your return. We use this information to assist you with the processing of your return (where we accept your return request).</p> <p>If you purchase Products through your trade account with us, our <a href="#">Terms and Conditions of Sale</a> will also apply to any return request you make. If you purchase Products on our Online store, our Online Store <a href="#">Terms of Sale</a> will apply.</p> <p><b><i>Our legal basis for processing</i></b></p> <p>It is necessary for us to use your personal data to perform our obligations in accordance with any contract that we may have with you for the Products, or it is in our legitimate interest or a third party's legitimate interest to use personal data in such a way to ensure that we are able to help you with your return or cancellation, provide a good standard of service and improve our processes and customer services.</p>

### Feedback and surveys

<p><b>If you complete our surveys or provide feedback on your experience of our Sites and/or our Products</b></p>	<p>From time to time, we may invite you to provide general feedback about us, our Sites and our Products in the form of online, email or postal surveys. We will collect and process your Identity Data, Contact Data and, if applicable, certain Registration Data, Profile Data and Transaction Data, as well as any other personal data you choose to volunteer in your feedback or survey response.</p> <p>You can also voluntarily provide feedback in person at our premises or by telephone, post or email or via our online enquiry form (please see the <a href="#">“Customer service and enquiries”</a> section above for more details).</p> <p>We use feedback and the information obtained through surveys to help us monitor and improve our Sites and our Products, to assist with the selection of future product and service lines, to train our personnel and to improve the quality of our customer service.</p> <p><b><i>Our legal basis for processing</i></b></p> <p>It is in our legitimate interest or a third party’s legitimate interest to use the personal data provided by you so that we can improve our Sites, Products, staff training and customer services and provide them in an effective way.</p>
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#### **Product safety and recalls**

<p><b>If your Product suffers a product safety issue</b></p>	<p>If we become aware of a product safety issue relating to any of our Products, we will investigate the problem and, where necessary, recall the Product. We will process certain personal data such as your Identity Data and Contact Data and any relevant Registration Data, Profile Data and Transaction Data to identify purchasers of the Product in question and to arrange a recall.</p> <p><b><i>Our legal basis for processing</i></b></p> <p>It is in our legitimate interest or a third party’s legitimate interest to use your personal data in the ways described above to ensure that we are able to help resolve any issues with our Products, maintain the safety of our Products and provide a good standard of customer service. We also have certain legal obligations in relation to product safety and may need to process personal data to comply with those legal obligations.</p>
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#### **Hosting and managing events**

<p><b>If you sign up for and/or attend an event organised, hosted or sponsored by us</b></p>	<p>From time to time, we may organise and host (whether alone or jointly with others) or sponsor events for the purpose of promoting our business or for charitable causes or other reasons. We may process your Identity Data and Contact Data to communicate with you about such events where you have specifically requested information about such events or</p>
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	<p>where we have another lawful basis for sending that information to you.</p> <p>If you attend one of these events, we may use your Identity Data, Contact Data and certain Profile Data to record your attendance at the event and for related record-keeping purposes. If relevant, we may also collect and process any dietary requirements you may have. You may also feature in photographs taken at such events and such photographs may appear in publications and PR materials that we make available online and in print.</p> <p><b><i>Our legal basis for processing</i></b></p> <p>It is necessary for us to use your personal data in this way to perform our obligations in accordance with any contract that we may have with you where you have signed up to attend an event, or it is in our legitimate interest or a third party's legitimate interest to use personal data in such a way to ensure that the event is operated in an effective way.</p> <p>We may specifically ask your permission to use your photographs, quotes, testimonials, or other content that you make available or publish at the event. Where this is the case, our processing of your such personal data will be based on your consent.</p>
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**Prize draws, prize competitions and other promotions**

<p><b>If you participate in one of our promotions</b></p>	<p>From time to time, we may run prize draws, prize competitions and other promotions on our Sites and/or on our social media accounts. For the purposes of administering such promotions, we may process your Identity Data and Contact Data, certain Registration Data, Profile Data and Transaction Data (where applicable) and any other personal data volunteered by you in relation to your promotion entry.</p> <p>Our promotions are subject to separate terms and conditions, which you may be required to accept as a condition of entry. Such terms and conditions will be made available to you in the promotional materials relevant to the promotion.</p> <p><b><i>Our legal basis for processing</i></b></p> <p>It is necessary for us to use your personal data to perform our obligations in accordance with any contract that we may have with you (e.g. the promotion terms and conditions) or it is in our legitimate interest or a third party's legitimate interest to use your personal data to enable us to administer our promotion fairly and effectively and to ensure that we comply with any self-regulatory codes governing the operation of promotions.</p>
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**Charitable activities**

<p><b>If you request a charitable donation from us</b></p>	<p>From time to time, we receive requests for charitable donations. If you make a request, your request will include</p>
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	<p>personal data, such as your Identity Data and Contact Data, as well as any other personal data you may include in your request. If your request is successful, we will ask you to complete a form, setting out the name of the organisation which is to receive the charitable donation and Financial Data such as the organisation's bank account details. As part of the application process, we may also ask you for further information about your request and your response may include additional personal data.</p> <p>We will use the information obtained through the application process to help us administer the process and to assess the merits of the specific request. We will use your name and contact details to communicate with you in relation to your request and, if the request is successful, we will process the bank account details provided to enable us to process our payment to the recipient. We also retain any personal data for record-keeping purposes.</p> <p><b><i>Our legal basis for processing</i></b></p> <p>It is in our legitimate interest or a third party's legitimate interest to use personal information in the ways described above to ensure that we are able to process and administer requests for charitable donations fairly and efficiently.</p>
<p><b>If you appear in photographs relating to our sponsorships and charitable activities</b></p>	<p>From time to time, we may offer financial support to organisations through sponsorship and other initiatives. We may occasionally publicise our involvement by publishing news and photographs about our sponsorship activities on our website and social media, as well as in other print and online media. If you feature in such news and/or photographs, we will process your personal data (which may include your Identity Data and any other relevant information) for the purpose of publicising our sponsorship and other charitable activities.</p> <p><b><i>Our legal basis for processing</i></b></p> <p>It is in our legitimate interest or a third party's legitimate interest to use personal information in the ways described above to ensure that we are able to promote our business and our sponsorship and charitable activities. If it is not within our legitimate interest, we will contact you to ask your permission, in which case our processing of such personal data will be based on your consent.</p>

**Insight, analysis and retargeting through Cookies**

<p><b>If we use cookies to help us understand more about you and your use of our Sites and our Products</b></p>	<p>We and our third-party partners use cookies, web beacons, pixels, tags and other similar technologies (which we generically refer to as "<b>Cookies</b>") to collect data from the devices that you use to access our Sites and our Products. The data that is collected includes Behavioural Data and Technical Data, and certain Profile Data and Transaction Data. Please see our <a href="#">Cookie Notice</a> for further information, including details of our third-party partners.</p>
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	<p>We and our third-party partners use this data to analyse how you use our Sites and our Products and the effectiveness of our Sites and our Products, including:</p> <ul style="list-style-type: none"> <li>• for the purposes described in the “<a href="#">If we carry out any online personalised advertising</a>”, “<a href="#">If we advertise to you on social media and other platforms</a>”, and the “<a href="#">If we advertise to other people who share similar interests and characteristics to you</a>” sections below;</li> <li>• to analyse how you use, and the effectiveness of, our Sites;</li> <li>• to count users who have visited our Sites and collect other types of information, including insights about visitor browsing habits, which helps us to improve our Sites, our Products and the effectiveness of our emails;</li> <li>• to measure the effectiveness of our content;</li> <li>• to learn what parts of our Sites are most popular and what kind of features and functionalities our visitors like to see;</li> <li>• to help us understand the type of marketing content that is most likely to appeal to our visitors and customers; and</li> <li>• to help us with the selection of future product and service lines, website design and to remember your preferences.</li> </ul> <p>In some of our email messages, we use a “click-through URL” linked to certain websites administered by us or on our behalf. We may track click-through data to assist in determining interest in particular topics and measure the effectiveness of these communications.</p> <p><b><i>Our legal basis for processing</i></b></p> <p>Where your data is collected through the use of non-essential cookies, we rely on consent to collect your personal data and for the onward processing purpose. Please see our <a href="#">Cookie Notice</a> for further details.</p> <p>In certain circumstances, we may rely on another lawful basis when we use your personal data collected via the use of Cookies. For example, where we use personal data collected through the use of analytics Cookies to analyse how you use our Sites, it is in our legitimate interest to use your personal data in such a way to improve our Sites and our Products.</p>
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**Advertising and marketing activities**

<p><b>If we send you marketing communications by post and/or email/SMS</b></p>	<p>We use your Identity Data, Contact Data and Marketing and Communications Data to send you (or the organisation you represent) marketing communications by post and/or email/SMS. Our marketing will include press releases and information about us, our Sites, our Products, any events we may hold and the offers and promotions we offer from time to time.</p>
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	<p>Our marketing communications will include personalised and non-personalised marketing.</p> <p>Personalised marketing has been specifically tailored to you and will include content that we think is most relevant to you, based on what we know about you. Personalised marketing would include emails about Products we know you have shown an interest in previously.</p> <p>Non-personalised marketing is marketing that is not tailored to you and is sent to subscribers generally, such as an email about a seasonal sale or promotion we may be running and which will be of interest to all of our customers.</p> <p>Where we are sending you personalised marketing, we may also use Profile Data, Transaction Data and Behavioural Data to help us decide what sort of personalised marketing to send you. Please see the "<a href="#">Insight, analysis and retargeting through Cookies</a>" section above for more details.</p> <p><b><i>Our legal basis for processing</i></b></p> <p>It is in our legitimate interest to use your personal data for marketing purposes, for example to decide what marketing content we think may appeal to you.</p> <p>It is in our legitimate interest to use your personal data to send our marketing to you by post.</p> <p>However, we will only send marketing communications to you by email and/or SMS where you have consented to receive such content by email and/or SMS, or where we have another lawful right to send marketing to you using email and/or SMS. For example, in certain circumstances we may rely on our legitimate interest to send marketing by email and/or SMS to customers who have purchased our Products. We may also rely on our legitimate interest to send marketing by email and/or SMS to certain business users of our Sites and our Products.</p>
<p><b>If we carry out any online personalised advertising</b></p>	<p>We and our third party partners may use your Profile Data, Behavioural Data and Technical Data, and other data that is collected through your interactions with third party websites and services, to provide you with, and analyse the effectiveness of, personalised ads when you visit other websites and/or use other services (including the social media and other platforms described in the "<a href="#">If we advertise to you on social media and other platforms</a>" section below).</p> <p>By "personalised ads", we mean advertisements for products and services that you have shown an interest in when you have used our Sites or which you otherwise might be interested in based on your browsing habits, although our third-party partners may use the data that is collected to show personalised ads for products and services offered by third parties.</p> <p><b><i>Our legal basis for processing</i></b></p>

	<p>Please see the <a href="#">“Insight, analysis and retargeting through Cookies”</a> section above to learn about the legal basis that we rely on to collect data via the use of Cookies.</p> <p>Where we use your personal data to display online personal advertising to you, we rely on the consent that you have provided in respect of the collection of such data, or it is otherwise in our legitimate interests to promote our Sites and our Products to you.</p> <p>Our third-party partners may rely on a different lawful basis in respect of their use of your personal data. Please read the privacy notice of the relevant third-party provider (see our <a href="#">Cookie Notice</a> and/or our <a href="#">Cookie Preference Centre</a> for details).</p>
<p><b>If we advertise to you on social media and other platforms</b></p>	<p>We share your email address and other identifiers such as your phone number or device ID (usually in an encrypted or ‘hashed’ form) with third-party providers of social media platforms and other services, such as Facebook and other similar platforms (“<b>Social Platforms</b>”), so that the third-party providers can try to “match” your data with the data of their registered users of their Social Platforms.</p> <p>Where there is a successful match, we will display our advertising to you when you use the relevant Social Platform (e.g. on your Facebook newsfeed). This is known as “custom audience” advertising, because we “customise” the audience that we want to reach on the relevant service.</p> <p>Some of the advertising that you see may be personalised to you. The data that we use to personalise our advertising, such as your Profile Data, Behavioural Data and Technical Data, will not be provided to the third-party providers of the Social Platforms for this purpose but please see the <a href="#">“Insight, analysis and retargeting through Cookies”</a> section for details of where we may share such data.</p> <p>This activity is also subject to the privacy choices you have elected to make on such Social Platforms.</p> <p><b><i>Our legal basis for processing</i></b></p> <p>We will only share your personal data with the third-party providers of the Social Platforms, so that we can advertise our Products to you when you use those Social Platforms, where you have provided your consent or where it is otherwise in our legitimate interests to do so in order to promote our Products.</p> <p>Where this activity is undertaken through the use of Cookies, please see the <a href="#">“Insight, analysis and retargeting through Cookies”</a> section to learn about the legal basis that we rely on.</p> <p>You can opt-out of our sharing of your personal information with the third-party providers by exercising <a href="#">your rights as a data subject</a> as set out below.</p>

<p><b>If we advertise to other people who share similar interests and characteristics to you (or if you are someone that sees such advertising)</b></p>	<p>We will provide your personal data to third-party providers of Social Platforms as described in the <u>“If we advertise to you on social media and other platforms”</u> and the <u>“Insight, analysis and retargeting through the use of Cookies”</u> sections. If you are a user of those Social Platforms, we may ask the third-party providers of those Social Platforms to find other registered users of their services who share similar interests and characteristics to you, which will be based on information that the third party holds about you and its other registered users.</p> <p>This is known as “lookalike” audience advertising because we are trying to show our advertising to people who “look like” you.</p> <p>If you are someone who has seen this advertising on a Social Platform, please note that this activity is based on data that you have provided to the Social Platform (which we do not receive) and is also subject to the privacy choices you have elected to make on such third-party services.</p> <p><b><i>Our legal basis for processing</i></b></p> <p>Please see the <u>“If we advertise to you on social media and other platforms”</u> section for details of the lawful basis that we rely on to share your personal data with the Social Platforms.</p> <p>It is in our legitimate interest to further use your personal data to advertise our Products to other individuals that use those Social Platforms and who share similar interests and characteristics with you.</p> <p>If you are someone who has seen this advertising on a Social Platform, it is in our legitimate interest that the Social Platform uses the data that you have provided to it to advertise our Products, although please note that we do not receive this data and you should exercise your rights in respect of such data in accordance with the privacy notice of the relevant Social Platform.</p>
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**Recruitment**

<p><b>If we use your personal data in connection with our recruitment activities</b></p>	<p>We use your personal data for recruitment purposes, in particular, to assess your suitability for any of our positions that you apply for, whether such application has been received by us online, by email or by hard copy and whether submitted directly by you or by a third-party recruitment agency on your behalf. We also use your Identity Data and Contact Data to communicate with you about the recruitment process, to keep records about our recruitment process and to comply with our legal and regulatory obligations in relation to recruitment.</p> <p>We will process any personal data about you that you volunteer, including during any interview, when you apply for a position with us. We may also process your personal data obtained from any third parties we work with in relation to our recruitment activities, including without limitation, recruitment</p>
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	<p>agencies, background check providers, credit reference agencies and your referees.</p> <p>The personal data we process may include your Identity Data, Contact Data, details of your education, qualifications and employment history, any other personal data which appears in your curriculum vitae or application, any personal data that you volunteer during an interview or your interactions with us, or any personal data which is contained in any reference about you that we receive. Such information may also include special categories of personal data (such as information about your health, any medical conditions and your health and sickness records) and information relating to criminal convictions and offences if that information is relevant to the role you are applying for.</p> <p>We also use your personal data for the purposes of reviewing our equal opportunity profile in accordance with applicable legislation. We do not discriminate on the grounds of gender, race, ethnic origin, age, religion, sexual orientation, disability or any other basis covered by local legislation. All employment-related decisions are made entirely on merit.</p> <p><b><i>Our legal basis for processing</i></b></p> <p>Where we use your personal data in connection with recruitment, it will be in connection with us taking steps at your request to enter into a contract we may have with you or it is in our legitimate interest to use personal data in such a way to ensure that we can make the best recruitment decisions.</p> <p>We will not process any special (or sensitive) categories of personal data or personal data relating to criminal convictions or offences except where we are able to do so under applicable legislation or with your explicit consent.</p>
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**Receipt of products and services from our suppliers**

<p><b>If we have engaged you or the organisation you represent to provide us with products or services</b></p>	<p>If we have engaged you or the organisation you represent to provide us with products or services (for example, if you or the organisation you represent provide us with services such as IT support or financial advice), we will collect and process your personal data in order to manage our relationship with you or the organisation you represent, to receive products and services from you or the organisation you represent and, where relevant, to provide our Products to others. The personal data we collect from you may include your Identity Data and Contact Data and any other personal data you volunteer which is relevant to our relationship with you or the organisation you represent.</p> <p><b><i>Our legal basis for processing</i></b></p> <p>It is necessary for us to use your personal data to perform our obligations in accordance with any contract that we may have with you or the organisation you represent, or it is in our legitimate interest or a third party's legitimate interest to use</p>
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	<p>personal data in such a way to ensure that we have an effective working relationship with you or the organisation you represent and are able to receive the products and services that you or your organisation provides, and provide our Products to others, in an effective way.</p>
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### Security and CCTV

<p><b>If we need to use your personal data in connection with the administration of our security measures</b></p>	<p>We have security measures in place at our premises, including CCTV and building access controls. Where relevant, there are signs in place showing that CCTV is in operation. The images captured are securely stored and only accessed on a need to know basis (e.g. to look into an incident). CCTV recordings are automatically overwritten after a short period of time unless an issue is identified that requires investigation (such as a theft).</p> <p>We may require visitors to our premises to sign in on arrival and where that is the case we will keep a record of visitors for a short period of time. Our visitor records are securely stored and only accessible on a need-to-know basis (e.g. to look into an incident).</p> <p><b><i>Our legal basis for processing</i></b></p> <p>It is in our legitimate interest or a third-party's legitimate interest to process your personal data so that we can keep our premises secure and provide a safe environment for our personnel and visitors to our premises.</p>
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### Business administration and legal compliance

<p><b>If we need to use your personal data to comply with our legal obligations or in connection with the administration of our business</b></p>	<p>We may use your personal data: (i) to comply with our legal obligations; (ii) to exercise and enforce our legal rights; (iii) to protect the rights of third parties; (iv) to comply with any formalities for executing documents; and (v) in connection with a business transition such as a merger, reorganisation, acquisition by another company, or sale of any of our assets.</p> <p><b><i>Our legal basis for processing</i></b></p> <p>Where we use your personal data in connection with a business transition, to exercise and enforce our legal rights or to protect the rights of third parties, it is in our legitimate interest or the legitimate interest of a third party to do so. For all other purposes described in this section, we have a legal obligation to use your personal data to comply with any legal obligations imposed upon us, such as a court order.</p> <p>We will not process any special (or sensitive) categories of personal data or personal data relating to criminal convictions or offences except where we are able to do so under applicable legislation or with your explicit consent.</p>
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**8 IF YOU FAIL TO PROVIDE YOUR PERSONAL DATA**

Where we are required by law to collect your personal data, or we need to collect your personal data in connection with a contract we have with you or the organisation you represent, and you fail to provide that personal data when we request it, we may not be able to perform the contract we have or are trying to enter into with you. This may apply where you do not provide the personal data we need in order to provide the Products you have requested from us or to process an application to register an account. In these circumstances, we may have to cancel your application or the provision of the Products to you, in which case we will notify you.

**9 HOW WE OBTAIN YOUR CONSENT**

Where our use of your personal data requires consent, you can provide such consent at the time we collect your personal data following the instructions provided, or by informing us using the contact details set out in the [“How to Contact Us”](#) section above.

**10 THIRD-PARTY LINKS**

This Privacy Notice only applies to personal data processed by us through your use of our Sites and/or in connection with our business operations. However, from time to time, our Sites may contain links to third-party websites and services. We have no control over these websites and services and this Privacy Notice does not apply to your interaction with the relevant third parties.

When you use a link to go from our Sites to another website (even if you don't leave our Sites) or you request a service from a third party, your browsing and interactions on any other websites, or your dealings with any other third-party service provider, is subject to that website's or third-party service provider's own rules and policies. For example, our Sites invite you to connect with us on social media platforms, such as Facebook, Instagram, YouTube, Twitter and LinkedIn. When you click on the links we provide to such third-party platforms, you will be transferred from our Sites to the relevant third-party platform and the privacy notice (and other terms and conditions) of that platform will apply to you.

We do not monitor, control or endorse the privacy practices of any third parties. We encourage you to become familiar with the privacy practices of every website you visit or third-party service provider that you use in connection with your interaction with us and to contact them if you have any questions about their respective privacy notices and practices.

**11 SHARING PERSONAL DATA**

When processing your personal data, we may need to share it with third parties (including other entities within our group of companies), as set out in the table below. This list is non-exhaustive and there may be circumstances where we need to share personal data with other third parties. However, we only share personal data with others when we are legally permitted to do so. When we share personal data with others, we put contractual arrangements and security mechanisms in place to protect the personal data shared and to comply with our data protection, confidentiality and security standards and obligations.

<b>Third-party suppliers who provide applications/ functionality, data processing or IT services</b>	<i>We share personal data with third parties who support us in providing our Sites and help provide, run and manage our internal IT systems. Such third parties may also include, for example, providers of information technology, cloud-based software-as-a-service, SEO, identity management, website design, hosting and management, data analysis, data back-up, security and storage services. The servers powering and facilitating that cloud infrastructure are located in secure data centres around the world, and personal data may be stored in any one of them. We also share your personal data with third-party service providers to assist us with insight</i>
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	<i>analytics. These providers are described in our <a href="#">Cookie Notice</a>.</i>
<b>Payment providers and banks</b>	<i>We share personal data with third parties who assist us with the processing of payments and refunds.</i>
<b>Printing, delivery and courier companies</b>	<i>We share personal data with suppliers who assist us in the delivery of our Products to our customers.</i>
<b>Advertising partners</b>	<i>We share personal data with third-party advertising partners, including those set out in our <a href="#">Cookie Notice</a> when you use our Sites. This data is used to provide you with, and measure the effectiveness of, online personalised advertising and for other advertising related activities.</i>
<b>Third-party marketing, review/survey administration and CRM specialists</b>	<i>We share personal data with specialist suppliers who assist us in managing our marketing database and sending out our post and email/SMS marketing communications and account-related communications. We also share data with third party organisations who help to administer our reviews and surveys.</i>
<b>Third-party suppliers who assist us in administering our promotions</b>	<i>We share personal data with specialist suppliers who assist us in administering our prize draws, prize competitions and other promotions.</i>
<b>Event partners and suppliers</b>	<i>When we run events, we will share your personal data with third-party service providers that are assisting us with the operation and administration of that event. If we are running an event in partnership with other organisations, we will share your personal data with such organisations for use in relation to the event.</i>
<b>Recruitment agencies and related organisations</b>	<i>We share personal data with external recruiters, third-party providers that undertake background checks on our behalf and other entities within our group of companies.</i>
<b>Credit reference, tracing and debt collection agents and fraud sharing organisations</b>	<i>We share personal data with third parties who carry out credit referencing and tracing services for us and who assist us with our fraud prevention and debt collection activities.</i>
<b>Auditors, lawyers, accountants, insurers and other professional advisers</b>	<i>We share personal data with professional services firms and insurers who advise and assist us in relation to the lawful and effective management of our organisation and in relation to any disputes or claims we may become involved in.</i>
<b>Law enforcement or other government and regulatory agencies and bodies</b>	<i>We share personal data with law enforcement or other government and regulatory agencies or other third parties as required by, and in accordance with, applicable law or regulation.</i>
<b>Other third parties</b>	<i>Occasionally, we may receive requests from third parties with authority to obtain disclosure of personal data, such as to check that we are complying with applicable law and regulation, to investigate an alleged crime, or to establish, exercise or defend legal rights. We will only fulfil requests for personal data where we are permitted to do so in accordance with applicable law or regulation.</i>

## 12 TRANSFERS OUTSIDE THE UK AND THE EEA

Where necessary in order to provide our Sites and our Products, we will transfer personal data to countries outside the United Kingdom (“**UK**”) and the European Economic Area (“**EEA**”).

Countries outside the UK and EEA have different data protection laws to the UK and the EEA. In particular, such countries may not provide the same degree of protection for your personal data, may not give you the same rights in relation to your personal data and may not have a data protection supervisory authority to help you if you have any concerns about the processing of your personal data. However, when transferring your personal data outside the UK or the EEA, we will comply with our legal and regulatory obligations in relation to your personal data, including having a lawful basis for transferring personal data and putting appropriate safeguards in place to ensure an adequate level of protection for the personal data. We will take reasonable steps to ensure the security of your personal data in accordance with applicable data protection laws.

When transferring your personal data outside the UK or the EEA, we will, where required by applicable law, ensure that at least one of the safeguards set out below is in place. Please contact us if you would like further information on the specific mechanisms used by us when transferring your personal data outside the UK or the EEA.

<b>Adequacy decisions</b>	We may transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the EU and/or UK authorities. For further details, see <a href="https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en">https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en</a> .
<b>Model clauses</b>	Where we use certain service providers, we may use specific contracts approved by the EU and/or UK authorities which give personal data the same protection it has in the UK and the EEA. For further details, see <a href="https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en">https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en</a> .

## 13 HOW LONG WE KEEP YOUR PERSONAL DATA

In respect of personal data that we process in connection with the supply of our Products, we may retain your personal data for up to [seven] years from the date of supply of the relevant Products and in compliance with our data protection obligations. We may then destroy such files without further notice or liability.

Where we process personal data in connection with the registration and use of a trade account, we may retain your personal data for up to [seven] years from the date that the trade account is terminated (and in compliance with our data protection obligations). We may then destroy such files without further notice or liability.

Regarding personal data we process in connection with any customer service contact, enquiry, feedback, survey, prize promotion or other similar contact with you, we will retain any personal data relevant to that request for [18 months] from the date of the request. We may then destroy such files without further notice or liability.

If you apply for a position with us and your application is unsuccessful, we will hold your data on file for a period of [six] months after the end of the relevant recruitment process for consideration for future employment opportunities. At the end of that period, or once you withdraw your consent, your data is deleted or destroyed.

Regarding any other personal data that we process, we will keep that personal data for as long as we need it for the purposes described in this Privacy Notice (and in compliance with our data protection obligations).

If any personal data is only useful for a short period (e.g. for a specific activity, promotion or marketing campaign), we will not retain it for longer than the period for which it is used by us for the relevant activity.

If you have opted out of receiving marketing communications from us, we will need to retain certain personal data on a suppression list indefinitely so that we know not to send you further marketing communications in the future. We will not use this personal data to send you further marketing unless you subsequently opt back in to receive such marketing.

**14 CONFIDENTIALITY AND SECURITY OF YOUR PERSONAL DATA**

We are committed to keeping the personal data you provide to us secure and we have implemented information security policies, rules and technical measures to protect the personal data under our control from unauthorised access, improper use or disclosure, unauthorised modification and unlawful destruction or accidental loss. In addition, all our employees and data processors (i.e. those who process your personal data on our behalf) are obliged to respect the confidentiality of the personal data of all users of our Sites and those who purchase our Products.

**15 PERSONAL DATA OF MINORS**

Our Sites are not intended for use by, or targeted at, minors and we do not knowingly collect personal data of minors. However, this does not prevent minors from providing personal data to us. If we do collect and process personal data of minors, we will comply with all applicable laws and regulations relating to the processing of personal data of minors.

**16 YOUR RIGHTS AS A DATA SUBJECT**

You have certain rights in relation to the personal data we hold about you. Please note that many data subject rights are not absolute and the extent to which they apply may vary depending on the circumstances and any exemptions that may apply. If you would like to exercise any of these rights, or wish to obtain further information on your rights, please contact us using the details set out in the [“How to Contact Us”](#) section above.

<b>Your right of access</b>	If you ask us, we will confirm whether we are processing your personal data and, if so, provide you with a copy of that personal data (along with certain other details). If you require additional copies, we may charge a reasonable fee for producing those additional copies.
<b>Your right to rectification</b>	If the personal data we hold about you is inaccurate or incomplete, you are entitled to have it rectified. If we have shared your personal data with others, we'll let them know about the rectification where possible. If you ask us, where possible and lawful to do so, we will also tell you who we've shared your personal data with so that you can contact them.
<b>Your right to erasure</b>	You can ask us to delete or remove your personal data in some circumstances, such as where we no longer need it or where you withdraw your consent (where applicable). If we have shared your personal data with others, we will let them know about the erasure where possible. If you ask us, where it is possible and lawful for us to do so, we will also tell you

	<p>who we have shared your personal data with so that you can contact them directly.</p>
<p><b>Your right to restrict processing</b></p>	<p>You can ask us to “block” or suppress the processing of your personal data in certain circumstances such as where you contest the accuracy of that personal data or you object to us processing it for a particular purpose. This may not mean that we will stop storing your personal data but, where we do keep it, we will tell you if we remove any restriction that we have placed on your personal data to stop us processing it further. If we’ve shared your personal data with others, we’ll let them know about the restriction where it is possible for us to do so. If you ask us, where it is possible and lawful for us to do so, we’ll also tell you who we’ve shared your personal data with so that you can contact them directly.</p>
<p><b>Your right to data portability</b></p>	<p>You have the right, in certain circumstances, to obtain personal data you have provided to us (in a structured, commonly used, machine-readable format) and to reuse it elsewhere or to ask us to transfer it to your chosen third party.</p>
<p><b>Your right to object</b></p>	<p>You can ask us to stop processing your personal data, and we will do so, if we are: (i) relying on our own or someone else’s legitimate interest to process your personal data, except if we can demonstrate compelling legal grounds for the processing; or (ii) processing your personal data for direct marketing purposes.</p>
<p><b>Your rights in relation to automated decision-making and profiling</b></p>	<p>You have the right not to be subject to a decision when it is based on automatic processing, including profiling, if it produces a legal effect or similarly significantly affects you, unless such profiling is necessary for the entering into, or the performance of, a contract between you and us.</p>
<p><b>Your right to withdraw consent</b></p>	<p>If we rely on your consent (or explicit consent) as our legal basis for processing your personal data, you have the right to withdraw that consent at any time. You can exercise your right of withdrawal by contacting us using our contact details in the “<a href="#">How to Contact Us</a>” section above or by using any other opt-out mechanism we may provide, such as an unsubscribe link in an email.</p>
<p><b>Your right to lodge a complaint with the supervisory authority</b></p>	<p>If you have a concern about any aspect of our privacy practices, including the way we have handled your personal data, please contact us using the contact details provided in the “<a href="#">How to Contact Us</a>” section above. You can also report any issues or concerns to a national supervisory authority in the Member State of your residence or the place of the alleged infringement. You can find a list of contact details for all EU supervisory authorities at <a href="http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm">http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm</a>.</p> <p>As we are incorporated in the UK, our regulatory authority is the Information Commissioner’s Office. Contact details can be found on its website at <a href="https://ico.org.uk">https://ico.org.uk</a>.</p>